

*The City of Greenville and
The Pitt County Consortium**

**ANALYSIS OF IMPEDIMENTS
TO
FAIR HOUSING**

September, 1998

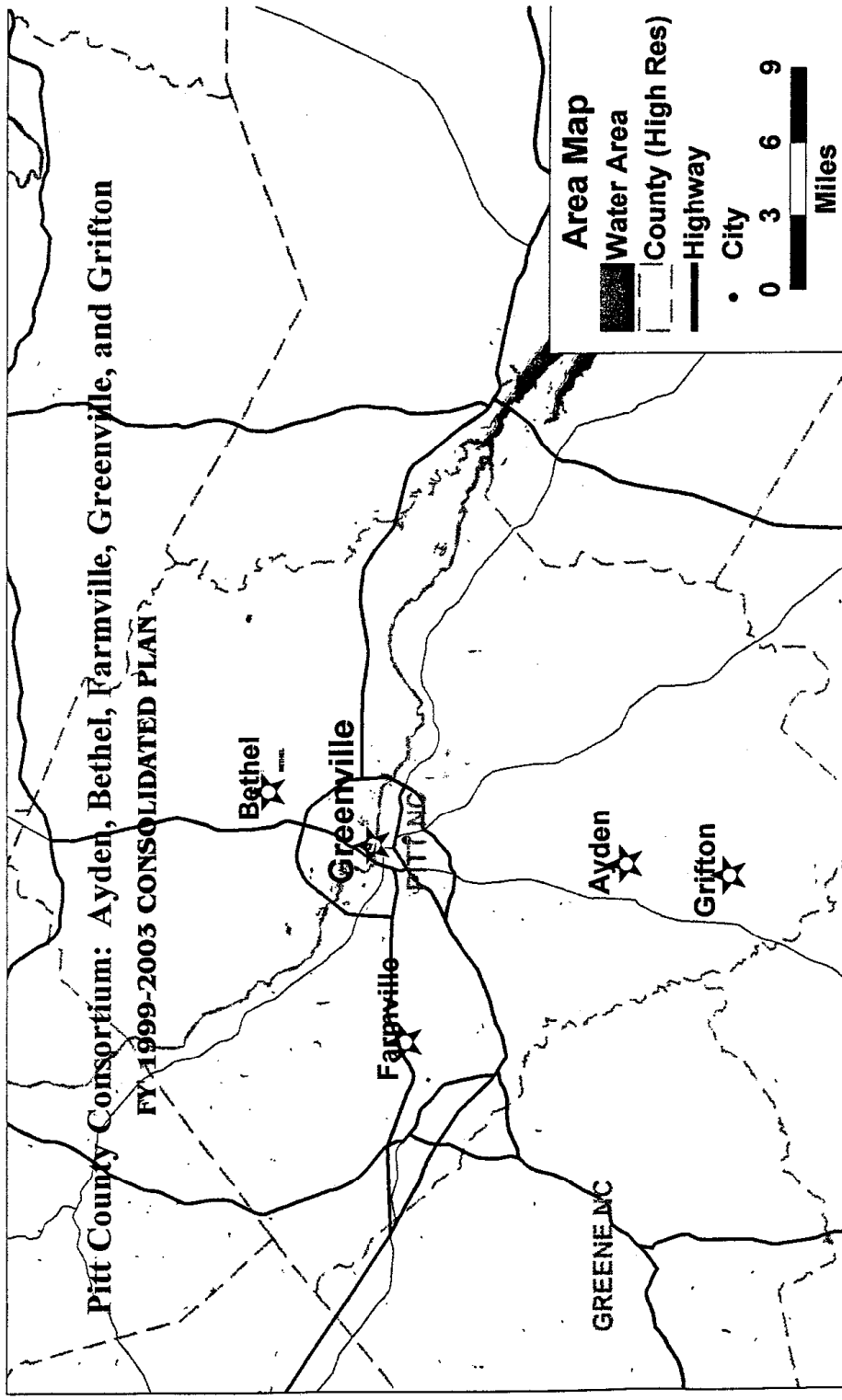


***County of Pitt: Towns of Ayden; Bethel; Farmville; Grifton; and the
City of Greenville, North Carolina**

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CCW

Pitt County Consortium: Ayden, Bethel, Farmville, Greenville, and Grifton
FY 1999-2003 CONSOLIDATED PLAN



**ADDENDUM TO
THE
IMPEDIMENTS TO FAIR HOUSING ANALYSIS
GREENVILLE-PITT COUNTY CONSORTIUM, NORTH CAROLINA
September, 1998**

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**Impediments to Fair Housing Analysis
Greenville, NC for the
Pitt County Consortium
September, 1998**

PREFACE

"Every American has a right to fair housing – to live where one chooses, to raise a family, to own a home. This is a fundamental right guaranteed to all. It cannot be denied to anyone because of race, color, national origin, religion, sex, familial status, or handicap. I pledge to you that the U.S. Department of Housing and Urban Development will act quickly and efficiently on all complaints of discrimination brought to our attention and every American will receive full protection of the law."

Henry Cisneros

Former Secretary, US Department of Housing and Urban Development (HUD)
(Reprinted from HUD Publication - "Fair Housing Update" (Fall 1993))

To state that "Fair Housing is the Law" is somewhat of an understatement. The principle of equality and freedom of housing choice should by inference, be deeply woven into the fabric of the other freedoms and liberties which help make America unique. The words of the former Secretary of the US Department of Housing and Urban Development, above, reflect a continuing strong commitment to these principles and their implementation. Realistically, however, elements that impede accomplishment of Fair Housing choice to the fullest reality do exist. The purpose of this study for the City of Greenville, North Carolina and the Pitt County Consortium (PCC) is to attempt to analyze or expose the existence of some of those inhibiting factors and to recommend actions to address them with the expectation of overcoming them.

Just prior to becoming part of the Pitt County Consortium, the City of Greenville completed an "Analysis of Impediments to Fair Housing" in April 1996, which was part of its responsibility as a CDBG Entitlement City. As part of the Consolidated Plan, HUD grantees (including Greenville and the PCC), have to submit an "Affirmatively

Furthering Fair Housing" (AFFH) certification, which requires them to undertake fair housing planning through three (3) major activities:

1. *Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;*
2. *Take appropriate actions to overcome the effects of any impediments identified through the analysis;*
3. *Maintain records reflecting the analysis and actions on this regard.*

These three (3) major activities are intended to lead to the ultimate accomplishment of the following for each grant recipient jurisdiction, including Greenville, and the Pitt County Consortium:

1. *Analysis and elimination of housing discrimination on the jurisdiction.*
2. *Promotion of fair housing choice for all persons.*
3. *Provision of opportunities for racially and ethnically inclusive patterns of housing occupancy.*
4. *Promotion of housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities.*
5. *Compliance with the nondiscrimination provisions of the Fair Housing Act.*

Through its CDBG and HOME programs, HUD's overall fair housing goal is to expand housing mobility, diversity, and to widen freedom of choice in housing decisions without regard to race, national origin, religion, familial status, or handicap.

Although this section is labeled "Preface," in a large sense, all of the foregoing analyses in this report leading to "Recommendations: Fair Housing Action Plan," might be considered "Preface." It is the Action Plan that is hopefully the most enduring output of this study.

I. SUMMARY OF METHODOLOGY, APPROACH, AND FINDINGS

A. Methodology an Approach

This Fair Housing Impediments analysis for the City of Greenville and the Pitt County Consortium was initiated as part of the City's and the Consortium's compliance with its recently submitted Consolidated Plan, the City of Greenville a HUD-entitlement Block Grant recipient. The analysis is the responsibility of the City of Greenville's Department of Planning and Community Development and was completed with assistance from Ken Weeden & Associates, Inc., (KWA) Planning Consultants under contract with the City. The project represented a cooperative effort between the City, the Pitt County Consortium (which includes Ayden, Bethel, Grifton, Farmville, and Pitt County), and several other entities. Although primary responsibility for data collection analysis, and report development was given to the consultant, who interfaced with various City departments and related staff, an extensive effort was made to obtain input from the Community at large.

These efforts included the following:

1. Meeting with Planning and Community Development Staff, et.al. to help identify key "actors" in the Housing Community.
2. Discussions with minority representatives of the local Real Estate Community to obtain additional input on issues.
3. Discussions with the Executive Officer of the Greenville Area Association of Realtors, to collect any historical information on Fair Housing Complaints/Problems and obtain information on the Association's Fair Housing activities.

4. Developing and submitting mail-out Fair Housing Survey Questionnaire to a cross-section of Greenville's and the Consortium's Housing, Community Development and Lending Community (see Appendix I).
5. Meeting with City staff from the Department of Planning and Community Development to collect base demographic data, land use ordinances, maps, etc., information on Fair Housing Policies, complaints, etc.
6. Contacting several statewide agencies for historic and/or analytic data. (These included the NC Human Relations Commission).

This study was developed using primarily the "Fair Housing Planning Guide" presented at a workshop conducted in November 1995 and the "SUGGESTED COMPONENTS OF THE ANALYSIS OF IMPEDIMENTS," provided by the US Department of Housing and Urban Development. The Survey Questionnaire, although relatively small in scope, contained qualitative information that proved to be very useful. The results of the survey are presented and discussed throughout the report. The survey format and a listing of all of the responses are contained in Appendix I.

The approach in this analysis of Impediments to Fair Housing included attempting to obtain seeking input from a broad cross-section of Greenville's and the Consortium's Housing Community. This included real estate representatives, landlords, bankers and other financial representatives, and advocacy groups. This was done in order to identify concerns and problems – both those in practice and those institutionalized – which interfere with fair housing choice.

B. Findings: Summary

1. According to analysis of the HMDA data for 1996, disparity and inequity in obtaining mortgage financing from several major lending institutions is an impediment to Fair Housing Choice in the greater Greenville area.
2. Non-representative, i.e., low number and percent of loans originating in census tracts with greater than 50% minority population is also an impediment to Fair Housing Choice in Greenville.

These factors are considered to be the major impediments to be addressed in a Fair Housing Plan of Action for Greenville

C. Format

The Analysis and Report is divided into five (5) major sections, or chapters with various subsections, as follows:

- I. **Summary: Methodology, Approach and Findings**
- II. **Identification of Fair Housing Concerns/Problems**
- III. **Demographic Analysis: City of Greenville and the Pitt County**
- IV. **Consortium Profile**
- V. **Existing Fair Housing Profile**
- VI. **Recommendations and Conclusions**

II. IDENTIFICATION OF FAIR HOUSING CONCERNS AND PROBLEMS

"The fair housing actions selected by the City should be related to local fair housing issues and thus reflect an informed reasonable level of activity."

USDHUD, June, 1994

The identification of fair housing problems in any jurisdiction can be difficult, primarily because of the "elusive" nature of concrete events or incidences. This is also generally true in Consortium area. Although the responses resulting from interview discussions and the survey results varied widely, the "general feel" was that: "Yes, Fair Housing Problems do exist, although difficult to detect."

A. What is "Fair Housing"?

Before examining possible incidences of fair housing impediments in Greenville and the Consortium, perhaps it is useful to begin by reviewing some of the "basics" of both federal; and State Fair Housing laws. (Note: the information which follows was compiled from a variety of publications, booklets, pamphlets, etc. from the USDHUD and the NC Human Relations Commission.)

1. Federal Provisions

A "basic" definition of Fair Housing Choice consists of the following:

"The ability of persons regardless of race, color, religion, sex, disability, familial status, or national origin of similar income levels to have available to them the same housing choices." (Excerpted from Fair Housing Workshop Handout, 4-95).

The basic federal provisions are contained in the federal Fair Housing Act, which was originally enacted in 1968, and the Fair

Housing Amendments Act of 1988. Notice the following excerpts from the USDHUD Publication: Fair Housing: It's Your Right, USDHUD, HUD 1260-FHEO (1), April, 1993:

"The Fair Housing Act prohibits discrimination because of:

- *Race or color*
- *National Origin*
- *Religion*
- *Sex*
- *Familial Status (including children under the age of 18 living with parents or legal custodians; pregnant women and people securing custody of children under 18)*
- *Handicap"*

The above categories of persons or families may be regarded as "protected classes," as far as discrimination in housing is concerned. The provisions of the Fair Housing Act cover most housing. In some circumstances, the Act exempts the following: owner-occupied buildings with no more than four units; single-family housing sold or rented without the use of a broker; and housing operated by organizations and private clubs that limit occupancy to members.

The Fair Housing Act also contains specific instructions on certain practices and actions that are clearly prohibited, especially related to the sale and rental of housing, and mortgage lending. Notice the following information extracted from the previously cited USDHUD publication:

a. Sale and Rental of Housing: Prohibitions

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different term, conditions, or privileges for sale or rental of dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- For profit, persuade owners to sell or rent (Blockbusting) or
- Deny anyone access to or membership in a facility or service (such as multiple listing service) related to the sale or rental of housing.

b. Mortgage Lending

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

c. Advertising

It is illegal for anyone to advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status or handicap. This prohibition against discrimination in advertising applies to single-family and owner-occupied housing unless otherwise exempt from the Fair Housing Act.

d. Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A Parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

Exemption: Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program or
- It is occupied solely by persons who are 62 or older or

- It houses at least one person who is 55 or older in at least 80 percent of the occupied units; has significant services and facilities for older persons; and adheres to a published policy statement that demonstrates intent to house persons who are 55 or older. The requirement for significant services and facilities is waived if providing them is not practicable and the housing is necessary to provide important housing opportunities for older persons.

(A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.).

e. Additional Protection for Persons with Disabilities

If you or someone associated with you:

- Have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Have a record of such a disability or
- Are regarded as having such a disability

Your landlord may not:

- Refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense, if necessary for the handicapped person to use the housing. (Where reasonable, the landlord may permit changes only if you agree to restore the property to its original condition when you move).

- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the handicapped person to use the housing.

Example: A building with a "no pets" policy must allow a visually impaired tenant to keep a guide dog.

Example: An apartment complex that offers tenants ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near her apartment if necessary to assure that she can have access to her apartment.

(However, housing need not be made available to a person who is a direct threat to the health or safety of others, or, who currently uses illegal drugs.)

As was noted, the federal Fair Housing Act was expanded (in the 1988 amendment) to protect persons with disabilities from discrimination in housing sales, rentals, or financing. The Act requires landlords and owners to make "reasonable accommodations" for an otherwise qualified handicapped tenant. For residents who have a physical handicap, "reasonable accommodations" may mean a wheelchair ramp, an exception to a no-pet policy for a seeing-eye dog, or modification to the interior of an apartment.

Further, in buildings that are ready for first occupancy **after** March 13, 1991, and have an elevator and four or more units:

- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All units must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats and other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars and,
 - Kitchens and bathrooms that can be used by people in wheelchairs

If a building with four or more units has no elevator and will be ready for occupancy after March 13, 1991, these standards apply to ground floor units.

(These requirements for new buildings do not replace any more stringent standards in State or local law.)

f. Additional General Provisions

In addition, it is illegal for anyone to threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.

2. NC State Provisions

The State of North Carolina also enacted a State Fair Housing Act, i.e. Chapter 41A "State Fair Housing Act." The State Fair Housing Act, administered by the NC Human Relations Commission, is very similar to the federal provisions. Some of the

State Fair Housing Act provisions are summarized in the following excerpt from the publication of the NC Human Relations Commission and NC Department of Administration, titled: **State Fair Housing Act: The Law in North Carolina**:

"41A-4. Unlawful Discriminatory Housing Practices.

(a) It is unlawful discriminatory housing practice for any person in a real estate transaction, because of race, color, religion, sex, national origin, handicapping condition, or familial status to:

(1) Refuse to engage in a real estate transaction;

(2) Discriminate against a person in the terms, conditions, or privileges of a real estate transaction or in the furnishing of facilities or services in connection therewith;

(2a) Refuse to permit, at the expense of a handicapped person, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to the handicapped person's full enjoyment of the premises; except that, in the case of a rental unit, the landlord may, where it is reasonable to do so, condition permission for modifications on agreement by the renter to restore the interior of the premises to the condition that existed before the modifications, reasonable wear and tear excepted;

(2b) Refuse to make reasonable accommodations in rules, policies, practices, or services, when these accommodations may be necessary to a handicapped person's equal use of and enjoyment of a dwelling;

(2c) Fail to design and construct covered multifamily dwellings available for first occupancy after March 13, 1991, so that:

a. The dwellings have at least one building entrance on an accessible route, unless it is impractical to do so because of terrain or unusual site characteristics; or

b. With respect to dwellings with a building entrance on an accessible route:

1. The public and common use portions are readily accessible to and usable by handicapped persons;

2. There is an accessible route into and through all dwellings and units;

3. All doors designed to allow passage into, within, and through these dwellings and individual units are wide enough for wheelchairs;

4. Light switches, electrical switches, electrical outlets, thermostats, and other environmental controls are in accessible locations;

5. Bathroom walls are reinforced to allow later installation of grab bars; and

6. Kitchens and bathrooms have space for an individual in a wheelchair to maneuver;

(3) Refuse to receive or fail to transmit a bona fide offer to engage in a real estate transaction;

(4) Refuse to negotiate for a real estate transaction;

(5) Represent to a person that real property is not available for inspection, sale, rental, or lease when in fact it is so available, or fail to bring a property listing to his attention, or refuse to permit him to inspect real property;

(6) Make, print, circulate, post, or mail or cause to be so published a statement, advertisement, or sign, or use a form or application for a real estate transaction, or make a record or inquiry in connection with a prospective real estate transaction, which indicated directly or indirectly, an

intent to make a limitation, specification, or discrimination with respect thereto;

(7) Offer, solicit, accept, use, or retain a listing of real property with the understanding that any person may be discriminated against in a real estate transaction or in the furnishing of facilities or services in connection therewith; or

(8) Otherwise make unavailable or deny housing.

3. Examples of Discriminatory Practices:

The following brief scenarios are presented as examples of discriminatory practices: (excerpted from the NC Human Relations Commission booklet: "Fair Housing is the Law in North Carolina")

"Examples of Housing Discrimination:

- A black person answers a newspaper ad for an apartment. The landlord tells him that the apartment has already been rented. It turns out that the apartment has not really been rented, and the landlord rents it to a white applicant who answers the same ad.
- A real estate agent tries to persuade someone not to buy or rent a house in a certain neighborhood because of the racial makeup of the neighborhood. This is called *steering*.
- A landlord refuses to rent an apartment to a man because he is mentally retarded.
- A newspaper ad says that housing is available for "White, Christian" applicants.
- A landlord evicts a White tenant from her mobile home because her Black friends visit her there.
- A resident manager refuses to rent an apartment to a family with children, or will only allow families with children to live in certain buildings or on certain floors, or charges families higher security deposits than singles.

- A landlord checks the credit records of all Black and Hispanic applicants and uses small credit problems as an excuse to refuse to rent apartments to them. It turns out that the landlord does not always check White applicants' credit records or overlooks small credit problems in their records.
- A property manager refuses to rent an apartment to a single woman, but he will rent the apartment to a single man.
- A bank refuses to lend money to a house buyer because the house he wants to buy is in a minority neighborhood. This is called *redlining*.
- A landlord refuses to rent an apartment to a blind woman because she has a seeing-eye dog.
- A rental manager charges minority tenants a larger security deposit, or higher rent, than White tenants.
- A female tenant and her family are evicted from their apartment because the woman refuses the landlord's sexual advances."

The State Fair Housing Act also contains exceptions similar to the federal provisions. Generally, the provisions of both the federal and state fair housing laws could involve Public Policies and Practices; Institutional Practices in the Real Estate Community; and Lending Institutions. More detailed information on these areas as they relate to Greenville and the Pitt County Consortium, will be presented in the following sections of this analysis.

B. Relevant Public Policies and Practices Regarding Zoning & Building Codes and the Impact on the Achievement of Fair Housing Choice

1. Land Use Regulations

a. Zoning

All of the above-referenced policy and practice areas will be discussed here under the auspice of land-use regulations for the City of Greenville. Perhaps the most important land use regulation used by most jurisdictions is zoning. Zoning is a means of insuring that land uses of a community are "compatible," i.e. properly situated in relation to one another. Traditionally, zoning ordinances are enacted to protect the Community's public health, safety, and welfare. Land uses, e.g. residential, commercial, industrial, etc. are separated into use districts or "zones" and are further regulated by density controls. The density controls are usually implemented by imposing "minimum" building lot sizes. The City of Greenville Zoning Ordinance has a total of 15 districts or zones, in which residential uses are permitted, either by "right," or "special use" permits. The minimum lot size requirements range from 6,000 square feet to 20,000 square feet for single family dwellings, and starting at 15,000 square feet for multi-family dwellings. In Greenville's Planned Units Developments (PUD), which are considered "special districts," the minimum lot size can go as low as 4,000 square feet. Table 1 provides summaries of the residential zoning districts in Greenville, along with minimum lot sizes. Generally, the smaller the minimum lot size, the lower the cost of the lot, which, theoretically, also lowers the cost of the dwelling unit.

Table 1: Institutional Factors: Residential Zoning Summary in Greenville, NC

	<u>Min. Lot Size Square Feet (ft²)</u>
1. RA-20	20,000 without public water 10,000 with public water
2. R-15S	15,000
3. R-9s	9,000
4. R-9	9,000 (Duplex, 13,500)
5. R-6s	6,000
6. single family and duplexes (Multi-Family)	6,000 15,000
7. R-6A (Duplex (Multi-Family)	6,000 9,000 15,000
8. R-6N (Duplex (Multi-Family)	6,000 9,000 15,000
9. R-6MH	6,000
10. PUD-Specialized District	10 Acres
11. MD-7	20,000 without public water 10,000 with public water
12. MD-5 single family and duplex Multi-Family	6,000 15,000
13. O&R (Duplex) (Multi-Family)	7,500 15,000
14. CDF (Single Family and Duplex) Multi-Family	6,000 15,000

Source: City Planning and Community Development Department and Greenville Zoning Ordinance .

"Exclusionary" zoning is a practice whereby certain areas are zoned "exclusively," which often results in discrimination against certain individuals. An example would be requiring an unusually large minimal residential building lot size. The covert factor of "housing affordability" rather than overt discrimination is often the real issue. In this example, ultimately, income is often the greater determinant of "choice," as will be presented in later discussions.

From a review of the City's Zoning Ordinance and Map, and discussions with the City Planning staff regarding the occupied housing patterns in the City of Greenville and the Consortium, it does not appear that zoning is a direct restrictive factor in impeding fair housing choice.

b. Subdivision Regulations

A second major land use regulation affecting housing development is a Subdivision Ordinance, or Subdivision Regulations. A subdivision is defined as:

"...a division of a tract or parcel of land into two or more lots, building sites, or other divisions for the purpose, whether immediate or future, of sale or building development and includes any division of land involving the dedication of a new street or a change in existing streets."

Whereas zoning affects density of development through control of building lot size, and spacing via front-, back-, and side yard requirements, subdivision regulations add certain minimum design standards for such development items as type of streets, widths of streets, sidewalks, curb and gutter, and/or other drainage features.

Ordinarily, the impact of subdivision regulations, as far as residential development is concerned, relates more to "cost" of development, which may in turn affect housing affordability. A decrease in minimum design standards usually results in a decrease in the developer's overall cost, which then could theoretically be passed on to the housing consumer. Again, as with zoning enforcement, affordability and fair housing choice are oftentimes closely related, but not necessarily. In Greenville and within the Consortium, based on a review of the Subdivision Regulations, it appears that these regulations do not impede fair housing choice within the Consortium's jurisdiction. The Subdivision Ordinance is enforced uniformly throughout its jurisdiction. Outside of Greenville, all of the other Consortium members, except Pitt County, also enforce Zoning Ordinances. All of the members, however, do enforce subdivision regulations.

Below is a summary of the presence of Zoning and/or Subdivision Regulations among the Consortium members.

Table 2: Incidence of Zoning/Subdivision Regulations: Consortium

Jurisdiction	Zoning Ordinances	Subdivision Regulations
Greenville	X	X
Pitt County		X
Ayden	X	X
Bethel	X	X
Farmville	X	X
Grifton	X	X

Source: Consortium Members

c. Building Codes

Building codes represent another set of regulations with the potential to impact fair housing choice. As noted in the HUD publication, Affordable Housing Streamlining Local Regulations, "A Handbook for Reducing Housing and Development Costs," there are generally two categories of codes usually imposed at the state or local level that pertain to buildings. These two categories, again generally, cover a) building construction, and b) building maintenance and use. Both are applicable in the City of Greenville and the Consortium. As for building construction, the Consortium members enforce the North Carolina State Building Code that covers such items as structural stability, electrical, plumbing, mechanical, energy conservation, and some specialty items in certain circumstances. Under the category of building use and maintenance, several Consortium members enforce a locally adopted Minimum Housing Codes. The purpose of a Minimum Housing Code is "...to establish minimum levels of safety, health, and sanitation in existing residential buildings and to provide a means for eliminating substandard housing." (Streamlining Local Regulations, p. 28). As a uniform statewide set of standards, the state Building Codes are enforced in the Consortium and the enforcement of the local City of Greenville and the Towns of Ayden, Bethel, Grifton, and Farmville Minimum Housing Code also does not appear to be an impediment to fair housing choice.

Additional development policies may be discussed or referred to in later sections of this analysis. For the Consortium members who do enforce the three basic land use regulations discussed in this section, it appears that they are enforced uniformly within their respective jurisdictions. As such, these policies do not appear to impede fair housing choice within the Consortium.

The "affordability" of housing can be an impediment to fair housing choice if members of the protected classes comprise a widely disproportionate share of the low-income segment of the area's population. However, information will be presented in the "Demographic Overview" section, concerning race, income levels, etc., within the Consortium.

2. Equalization of Municipal Services

Within the Consortium, among the one (1) county government and five (5) municipalities, the following municipal and/or utility services are provided:

- a. Water
- b. Sewer
- c. Storm drainage facilities
- d. Parks and Recreation
- e. Street paving and maintenance
- f. Sanitation and trash removal
- g. Electricity
- h. Natural Gas

All of these services are not found within each jurisdiction, but it appears where they are found that the general policies are to provide all services on an equal geographic basis.

Based on discussions with City representatives, and a review of the City's Comprehensive Plan, i.e. Comprehensive Plan for the City of Greenville, North Carolina, November, 1989, it appears that

the City's policies are to provide all municipal services on an equal geographic basis. All areas within the City's current jurisdiction have access to all of the above services. It should be noted, however, that there is a small area within the City limits where although centralized sewer service is accessible, some septic tanks still exist through a "grandfather" clause. However, when these systems fail, the residents are required to tap onto the City's centralized sewer system.

There does not appear to be any identifiable inequities in the provision of municipal services among the Consortium members that could subsequently impede Fair Housing choice.

C. Institutional Practices in the Real Estate Community

1. General: Unlawful Discriminatory Housing Practices

The preceding discussions addressed some basic descriptions of "Fair Housing," and how the enforcement of certain land use regulations, building codes, and provision of municipal services in the City of Greenville and the PCC may impact fair housing choice. A link between such enforcement programs and fair housing may be present but difficult to detect. Institutional practices, depending on the frequency of reported occurrences, may be more "visible," but still difficult to pinpoint. This section of the report will briefly examine certain aspects of the Real Estate community as they relate to the following:

- a) Buying, Selling and Renting
- b) Advertising

c) Provision of Housing Brokerage Services

Some discriminatory practices within a locality, such as housing rental and/or loan application procedures, residential residency requirements, application forms, approval procedures for loans and insurance, etc., can become so routine that they become "institutionalized." There are many such practices that have a definite and negative impact upon fair housing choice. Although not easy to detect, some practices are more noticeable than others and can involve both real estate agencies and lending institutions. In order to understand better some of the elements which fall into the category of "institutional practices," a review of information provided by the North Carolina Human Relations Commission, which enforces the state's Fair Housing Act, might be useful. The following list is taken from: **The North Carolina State Fair Housing Act - A Guide to Understanding and Enforcing the Law**, North Carolina Human Rights Commission, 1990:

Unlawful Discriminatory Housing Practices

(When based on Race, Color, Religion, Sex, National Origin, Familial Status, or Handicap)

1. page 3-4: "A discriminatory advertising
2. falsely denying housing is available
3. screening applicants differently
4. refusing to allow a person to apply for housing
5. refusing to sell
6. refusing to rent
7. refusing to transmit an offer to buy or rent
8. different terms of purchase contract
9. different terms of lease
10. charging different rent
11. charging different purchase price
12. charging different security deposit
13. enforcing tenant rules unequally
14. not allowing use of facilities connected with housing, or allowing use under different terms
15. not providing maintenance and services, or providing unequal maintenance and services
16. segregation within complex or within buildings
17. solicit, accept, use or retain real estate listing understanding that discrimination may occur in a real estate transaction
18. refusal to make a real estate loan
19. different terms of a real estate loan
20. redlining - refusing to lend money because house is in minority neighborhood
21. steering - attempting to influence where someone lives based on the protected status of the person, or the neighborhood
22. blockbusting - inducing panic selling with references to change in neighborhood demographics
23. harassment, coercion, or intimidation by neighbors
24. harassment, coercion, or intimidation by landlord
25. retaliation against someone who files a complaint, or against an investigation witness
26. eviction
27. foreclosure
28. discrimination in providing brokerage services
29. refusing membership in multiple listing service
30. refusing membership in brokers association
31. otherwise making housing unavailable

Commission Source: (Guide to Understanding and Enforcing the Law," NC Human Rights).

2. Buying, Selling and Renting

In order to gain insight into some of these problems, concerns, and practices in the City of Greenville and the Pitt County Consortium input was sought directly from representatives of housing services, the real estate, and lending communities, primarily through the use of a widely distributed survey questionnaire. The Consultant and Greenville's Deputy Director of Planning and Community Development also discussed, directly, certain issues with experienced African-American real estate agents, the Human Relations Specialist of the City's Human Relations Department (concerning prior complaints, etc.), the Executive Officer of the Greenville Area Association of Realtors, and representatives of some lending institutions. Input was obtained via the survey questionnaire, telephone conversations, and one-on-one meetings. Also, the NC Human Relations Commission was contacted, for information on prior complaints. The information obtained is discussed further below.

a. Input from Minority Real Estate Brokerage Representatives

In addition to an area-wide survey questionnaire, the Consultant and representatives of the City's Planning and Community Development Staff conducted informal, but candid discussions with minority real estate professionals working in the Greenville area. During these meetings, the brokers were advised of the purpose of the impediments analysis. They were encouraged to speak openly, candidly and even anonymously if they wished, about their observations.

Discussions ranged from brokerage/lending, and even property insurance issues. Below are some highlights of their local observations.

1. *A lack of African-American lenders in the mortgage field which may be more responsive to the needs of African-Americans.*
2. *Isolated steering of African-Americans away from majority white neighborhoods by Realtors and whites away from neighborhood with more than an average number of African-Americans.*
3. *Some rental property owners and management firms continue to ask applicants questions regarding number of children in families.*
4. *Lack of properties available for the Section 8 Program.*
5. *When competing offers are available from a white buyer and an African-American buyer for the same dollar amount, the offer from the white buyer is accepted.*

In summary, the brokers indicated, that based on their experiences, disparities in obtaining mortgage financing between minorities and non-minorities, rental refusals for large families, "favoring" potential white buyers over African-American potential buyers for the same unit, and implications of racial steering, likely impediments to fair housing in the Greenville-Pitt County Consortium area.

b. Input from Survey Questionnaire

1. The 1998 Fair Housing Survey questionnaire, which was sent out to a broad range of community representatives, including the Association of Realtors (distributed with the Association's assistance at one of their monthly luncheon meetings), handicapped housing representatives, the public

housing authority, and local financial institutions. The first question was "Are you or your organization aware of the basic Fair Housing Requirements?" All respondents replied yes. A detailed summary of the entire survey is presented beginning below:

Number completed and returned:

30

Type of agency responding:

	<u>No.</u>	<u>Percent of Respon</u>
1. Real Estate Agency	18	60%
2. Housing Service Provider	1	3%
3. Lending Institution	5	17%
4. Insurance	2	7%
5. Appraisal	0	0%
6. Other	4	13%
TOTAL	30	100%

Questions/Responses:

1. Are you/or your agency/organization aware of the "basic" Fair Housing requirements (which prohibits discrimination in buying, selling, renting, or lending, if based on race, color, religion, sex, natural origin, family status, or handicap). Yes 30 No 0.
2. Are you/or your agency/organization aware of any "Fair Housing Complaints," in Greenville/Pitt County within the past five (5) years? Yes 4 No 26.

If yes, please describe briefly, or simply list below:

1. Bank loan officers steering African-American borrowers toward specific real estate agents and away from their own neighborhoods if they can afford to purchase.
2. Houses and apartment rentals; Housing appraisal.
3. Unfair lending practices.
4. Subtle; Research would be to compare the price of homes White [women] bought compared to Black [women] during the same period [of time] on the subsidized program. There seems to be a difference (above is not just on race, but on overall education, class, etc. as well.).

3. What, in your opinion, or assessment, are the major problem(s) inhibiting Fair Housing "Choice" in Greenville/Pitt County? (Please list, if any).

	<u>Responder Type</u>
1. Loan officers steering toward mobile homes and outside of desired purchases if family can afford higher loans	Housing Service Provider
2. Many of the landlords are not providing appropriate maintenance for the homes/apartments they are renting	Other
3. The City does not have a Fair Housing Ordinance	Other (Human Relations Office Lender)
4. Availability of affordable homes	
5. Lack of education of the consumer regarding [his/her] rights	Other
6. We're still in the South, small town mentality; wanting to "protect" their neighbors	
7. Prejudice	Real Estate Agency
8. Past prejudice, income level	Real Estate Agency
9. Lack of available financing and lack of knowledge of the ones that do exist	Real Estate Agency
10. Some buyers and sellers request race information regarding neighborhoods and buyers	Real Estate Agency

4. What do you think might be solutions?

	<u>Responder Type</u>
1. Loan officer hired that specifically target affordable housing; more minority loan officers needed	Housing Service Provider
2. I am new to the Greenville area but as a social worker and having been in some of these rentals, there needs to be some sort of stricter policies and regulations for landlords to go by	Other
3. A Fair Housing Ordinance.	Other
4. Credit counseling and homeownership counseling; public/private partnership to reduce housing/construction costs and/or down payment assistance	Lender
5. More conveniently located and timed informational sessions or neighborhood-based information providers.	Other

- | | |
|---|--------------------|
| 6. Education of public in some way; property that is run-down, owners to clean, repair, haul trash and junk | Real Estate Agency |
| 7. No references to race on forms, etc. (would limit research); have "buyers" to represent minorities | Real Estate Agency |
| 8. Continue to observe fair and equal treatment guidelines | Real Estate Agency |
| 9. Continue to promote fair housing and more specifically that real estate agents cannot be involved in such activities (refer to response #10 above) | Real Estate Agency |
5. Does your lending institution have "special" Community Reinvestment Act (CRA) projects/activities or initiatives targeted to Greenville/Pitt County? (lenders only) Yes 6
No 1
(Please list 2-3 examples, if any)
1. We offer 97% financing for homebuyers. We are allowed to use city grants for the 3% down payment.
 2. CRA Roundtable meetings; First Time Buyers seminars; year-long focus on CRA for small businesses and affordable housing opportunities (interacting with CDCs in the area for affordable housing opportunities).
 3. Special loan program-City of Greenville.
 4. WG; CHIP; FHA-VA loans.
 5. Participation in Homebuyers Nights for last two years (1st time Homebuyers @ Willis Building).
6. Would you or a representative of your organization be willing to participate on a "Fair Housing Review Board," if the City established one in the future?
Yes 14 No 12.

c. Input from Greenville Human Relations Office

The City of Greenville's Human Relations Office is the officially designated City agency responsible for receiving Fair Housing Complaints. The Office, along with a Human Relations Council (an advisory body), and Staff were

created by the City ordinance in 1972, after the City had taken steps to deal with issues of equality and diversity in employment and in housing, going back to the "Good Neighbor Council" in 1966. Although the Human Relations Office is not considered to be a HUD "Substantially Equivalent" enforcement agency, the Office does conduct intake from potential complainants, conduct interviews, and file housing discrimination complaints to either the NC Human Relations Commission, or to the NC Fair Housing Center. The complaints are filed to the other entities if warranted, i.e., if they cannot be resolved locally. The office currently does not have any annual report data for any previous years. However the Human Relations Specialist stated that, most of the complaints coming to their office relate to "landlord/tenant" problems and "unfair treatment." Since most of the housing complaints brought to the Department are allegations of landlord and/or tenant negligence, they often have little or nothing to do with race, or any of the other discriminatory classifications. Most complaints are resolved locally, with a few, as noted above, being referred to the State Human Relations Commission, and/NC Fair Housing Center.

d. Input from Association of Realtors

In discussions with the Executive Officer of the Greenville Area Association of Realtors, it was pointed out that no complaints of a discriminatory nature—in buying or selling—had been reported. According to the Executive Officer, a non-minority female, the types of complaints which the

Board hears of occasionally, concern tenant/landlord relations but not of a discriminatory nature, i.e., not necessarily involving a member of a protected class .

Also, until they were recently discontinued, the local Association had widely promoted the use of Voluntary Affirmative Marketing Agreements (or VAMA's) among its membership. The VAMA's, which had been recommended for adoption by local realtors' associations, were intended to promote anti-discriminatory practices within the Real Estate brokerage profession. Presently, VAMA's are being replaced by a new program which is being promoted nationally by the National Association of Realtors (NAR). This program, also being developed by agreement with the U.S. Department of Housing and Urban Development (HUD), is called the Cultural Diversity Certificate Program. Instead of an entire local association adopting a VAMA, any individual real estate professional can take a requisite course in cultural diversity-sensitivity and upon successful completion, receive his/her own certificate.

It is expected that widespread acceptance and implementation of the Cultural Diversity Certificate Program will greatly enhance fair housing efforts in the housing brokerage profession.

e. Input from NC Human Relations Commission

The State of North Carolina's Human Relations Commission, after being contacted by the Consultant, reported receiving 10 Fair Housing Complaints from Greenville-Pitt County, since 1993. (However, the detailed nature of those complaints is not readily available).

3. Advertising

In the City of Greenville, as in most urbanized areas, there is a Board of Realtors, or Association of Realtors, which publishes a Multiple Listing Service (MLS). A sample review of the MLS entries for the Greenville vicinity did not indicate any unusual advertising features that would appear to impede fair housing choice. The local newspaper, The Daily Reflector, contains listings in the "Classified" section for both sales and rentals. There are also several other privately published books, or booklets which contain advertisements for sales. A sample review of the ads in these publications did not indicate any language or other elements which appear to be discriminatory. There did not appear to be any implications of "racial steering," or "identification" of ethnic neighborhoods in any of the publications. The listings appear to be standard and uniform. It should be noted that the Greenville Area Association of Realtors has a "Fair Housing Committee," which is chaired by a member of the Association.

Other advertising mediums, for sale and rentals in Greenville, include television, radio, newspaper ads, real estate specialty magazines, and notices contained in local entertainment magazines or "shoppers." The "For Sale" ads all appear fairly

straightforward, with no overt indication of discrimination or impediments to fair housing.

Advertising in some other geographical areas, may indicate the need for increased public education and awareness of Fair Housing information.

4. Discrimination in Provision of Housing Brokerage Services

In the Pitt County-Greenville area, there are minority real estate professionals who both operate their own brokerage services and some who work in agencies which are non-minority owned. Based on direct input from several minority real estate professionals in the area, there are indications that some "steering" does occur within the profession, albeit very subtle. (See discussion in section "a", above).

D. Lending Institutions

1. Discriminatory Lending Patterns, Practices and Disclosures

There are a number of general lending and mortgage lending institutions in Greenville. Generally, these institutions are local branches of larger, state-wide entities such as NationsBank, First Union, Wachovia, BB&T, Branch Banking & Trust Co., and First Citizen's Bank, though there are some smaller, local lenders. Their advertising is multi-media, i.e. from television to billboards, to one-half and full-page newspaper ads, to small brochures. In nearly all cases, their advertising is punctuated with "An Equal Housing Lender."

However, the actual flow of credit for home purchases, repairs, etc. may not necessarily be "equal" for all members or sections of a community. During the 1970's evidence of the occurrence of "redlining", i.e. where lending institutions theoretically drew "redlines" around minority and/or low-income areas and refused to make loans, led to several pieces of federal legislation aimed at alleviating the problem. The principle response was the enactment of the Community Reinvestment Act (CRA) in 1977. The CRA requires that all federally regulated lending institutions:

"Continually and affirmatively meet the credit needs of all segments of the community they serve, including low-income and under-served neighborhoods"

Notice the following excerpt from the general association information brochure published by the Raleigh-based Community Reinvestment Association of North Carolina:

"...CRA thus redefined the role that lenders traditionally have played in low-income and minority communities. By emphasizing the responsibility financial institutions have to address credit needs in such areas, CRA rejects the idea that banks and thrifts can do little more than take deposits in these neighborhoods. In short, CRA encourages all banks and thrifts to make as affirmative an effort to meet the credit and banking service needs of low-income and minority communities as they do in the other neighborhoods they serve."

One of the main intents of the CRA is to provide an effective framework that local citizens can use to help make sure that banks

and thrifts (Savings and Loans) are indeed meeting their obligations to improve access to capital in their communities. However, due in part to the difficulty in "tracking" the performance of lending institutions, lenders are now required to provide detailed information on loan applications, approvals, denials, etc. by race, income status, and census tracts. This requirement is under the provisions of the Home Mortgage Disclosure Act, (HMDA). The reporting requirements of HMDA apply to census-defined "Metropolitan Statistical Areas," i.e. MSA's. Beginning below is a summary analysis of 1996 HMDA data for the MSA.

a. Summary of 1996 HMDA Reports

In order to obtain a comprehensive overview of the general mortgage lending patterns of all of the major lenders in the Greenville, MSA, the Consultant obtained 1996 HMDA data from the Right-To-Know Network (RTKNet) for further analysis.

(Please note that during the latter phase of this analysis for the Pitt -Greenville Consortium, the 1997 HMDA data was released. However, RTKNet has not yet formatted the data into "user friendly" forms. Thus, it was decided to use the more readily available and extensive 1996 information.)

First, notice Table 2, which presents a summary of all the mortgage loans/denial activity in the Greenville MSA during 1996. Of the total 7,113 loan applications initiated, overall 2,569 (36.1%) were denied, while 3,434 were successfully originated. The "average" denial rate, (not considering any

reasons or causes), is about 36% across the board, regardless of ethnicity. However, when loan origination and denials are viewed from the standpoint of ethnic differences, some disparities are evidenced. For example, the loan denial rates for Blacks (57.4%) is twice that of whites (22.1% and below the average). The denial rates are even higher for Hispanics, at 44.4%.

Table 2: Greenville, NC MSA HMDA Analysis, 1996
Total Loan Originations and Denial Rates by Ethnicity

	Loans Attempted	Denied	Denial Rates	Originated
Total	7,113	2,569	36.1%	3,434
White	3,875	858	22.1%	2,474
Black	2,224	1,276	57.4%	629
Native Am.	25	14	56.0%	9
Asian	40	7	17.5%	27
Hispanic	72	32	44.4%	28
Other	92	43	46.7%	29
Unknown	35	2	5.7%	33

Source: RTK NET: FFIEC HMDA Data Base: compiled by Ken Weeden & Associates, Inc.

The origination and denial rates can be even more disparate, ethnically, when individual lending institutions are considered. Notice Tables 3A and 3B which show loan attempted versus denials by lender in the Greenville MSA in

Table 3A: Alphabetical Listing

Lender	Total Loans Denied by Ethnicity				Total Loans Attempted by Ethnicity				Loan Denial Rate by Ethnicity			
	Black	White	Hispanic	Other	Black	White	Hispanic	Other	Black	White	Hispanic	Other
1) Access Financial Lending Corp.	51	26	2	0	79	49	2	0	63.8%	53.1%	100.0%	0.0%
2) Bank of America, FSB	116	44	3	9	172	156	4	13	74.4%	56.4%	75.0%	69.2%
3) Branch Banking & Trust Company	16	18	0	0	34	47	265	1	34.0%	6.8%	0.0%	0.0%
4) Centura Bank	7	16	0	0	23	29	144	0	24.1%	11.1%	0.0%	0.0%
5) Columbia National Inc.	6	1	0	0	7	21	77	2	28.6%	1.3%	0.0%	0.0%
6) Creslar Mortgage Corporation	0	0	0	0	0	7	88	0	0.0%	0.0%	0.0%	0.0%
7) Dover Mortgage Company	0	0	0	0	0	45	153	1	0.0%	0.0%	0.0%	0.0%
8) First Citizens Bank & Trust Co.	8	11	0	0	19	21	124	1	38.1%	8.9%	0.0%	0.0%
9) Ford Consumer Finance Co., Inc.	115	52	6	16	189	130	74	6	88.5%	70.3%	100.0%	94.1%
10) Green Tree Financial	406	278	11	13	708	646	616	26	62.8%	45.1%	42.3%	76.5%
11) Home Savings Bank, SSB	0	1	0	0	1	4	80	0	0.0%	1.3%	0.0%	0.0%
12) Nationsbank Mortgage Corp.	6	5	0	1	12	23	137	2	26.1%	3.6%	0.0%	33.3%
13) Nationsbank, N.A.	28	42	0	1	71	61	202	0	45.9%	20.8%	0.0%	12.5%
14) Norwest Mortgage, Inc.	1	5	0	0	6	12	74	0	8.3%	6.8%	0.0%	0.0%
15) Oakwood Acceptance Corporation	76	104	3	0	185	133	240	7	58.6%	43.3%	42.9%	0.0%
16) Southern Bank and Trust Co.	4	3	0	0	7	8	52	0	50.0%	5.8%	0.0%	0.0%
17) Southtrust Mobile Services, Inc.	213	76	6	1	296	245	85	6	86.9%	89.4%	100.0%	100.0%
18) State Employees' Credit Union	3	1	0	0	4	20	155	2	15.0%	0.6%	0.0%	0.0%
19) The Chase Manhattan Bank	34	21	0	0	55	53	53	2	64.2%	39.6%	0.0%	0.0%
20) Trans Financial Mortgage Co.	0	1	0	0	1	0	46	0	0.0%	2.2%	0.0%	0.0%
21) Triangle Bank	6	1	0	0	7	19	47	1	31.6%	2.1%	0.0%	0.0%
22) United Carolina Bank	12	14	0	1	27	24	196	0	50.0%	7.1%	0.0%	14.3%
23) United Companies Financial Corp.	31	15	1	2	49	70	57	1	44.3%	26.3%	100.0%	66.7%
24) United Federal Savings Bank	3	1	0	0	4	7	34	0	42.9%	2.9%	0.0%	0.0%
25) Vanderbilt Mortgage	60	27	0	1	88	120	79	1	50.0%	34.2%	0.0%	25.0%
26) Wachovia Bank- North Carolina	3	1	0	1	5	7	28	0	42.9%	3.4%	0.0%	12.5%
27) Wachovia Mortgage Company	5	5	0	0	10	20	177	0	25.0%	2.8%	0.0%	0.0%

Source: RTKNet/KWA Inc.

Table 3B: Ranked by Number of Attempts

Lender	Total Loans Denied by Ethnicity				TOTAL	Total Loans Attempted by Ethnicity				TOTAL	Loan Denial Rate by Ethnicity				TOTAL
	Black	White	Hispanic	Other		Black	White	Hispanic	Other		Black	White	Hispanic	Other	
1) Green Tree Financial	406	278	11	13	708	646	616	26	17	1305	62.8%	45.1%	42.3%	76.5%	54.3%
2) Oakwood Acceptance Corporation	78	104	3	0	185	133	240	7	1	381	58.6%	43.3%	42.9%	0.0%	48.6%
3) Southtrust Mobile Services, Inc.	213	76	6	1	296	245	85	6	1	337	86.9%	89.4%	100.0%	100.0%	87.8%
4) Branch Banking & Trust Company	16	18	0	0	34	47	265	1	4	317	34.0%	6.8%	0.0%	0.0%	10.7%
5) Nationsbank, N.A.	28	42	0	1	71	61	202	0	8	271	45.9%	20.8%	0.0%	12.5%	26.2%
6) Bank of America, FSB	116	44	3	9	172	158	78	4	13	251	74.4%	56.4%	75.0%	69.2%	68.5%
7) Ford Consumer Finance Co., Inc.	115	52	6	16	189	130	74	6	17	227	88.5%	70.3%	100.0%	94.1%	83.3%
8) United Carolina Bank	12	14	0	1	27	24	196	0	7	227	50.0%	7.1%	0.0%	14.3%	11.9%
9) Wachovia Mortgage Company	5	5	0	0	10	20	177	0	10	207	25.0%	2.8%	0.0%	0.0%	4.8%
10) Vanderbilt Mortgage	60	27	0	1	88	120	79	1	4	204	50.0%	34.2%	0.0%	25.0%	43.1%
11) Dover Mortgage Company	0	0	0	0	0	45	153	1	2	201	0.0%	0.0%	0.0%	0.0%	0.0%
12) State Employees' Credit Union	3	1	0	0	4	20	155	2	0	177	15.0%	0.6%	0.0%	0.0%	2.3%
13) Centura Bank	7	16	0	0	23	29	144	0	1	174	24.1%	11.1%	0.0%	0.0%	13.2%
14) Nationsbank Mortgage Corp.	6	5	0	1	12	23	137	2	3	165	26.1%	3.6%	0.0%	33.3%	7.3%
Lender	Black	White	Hispanic	Other	TOTAL	Black	White	Hispanic	Other	TOTAL	Black	White	Hispanic	Other	TOTAL
15) First Citizens Bank & Trust Co.	8	11	0	0	19	21	124	1	1	147	38.1%	8.9%	0.0%	0.0%	12.9%
16) Access Financial Lending Corp.	51	26	2	0	79	80	49	2	0	131	63.8%	53.1%	100.0%	0.0%	60.3%
17) United Companies Financial Corp.	31	15	1	2	49	70	57	1	3	131	44.3%	26.3%	100.0%	66.7%	37.4%
18) The Chase Manhattan Bank	34	21	0	0	55	53	53	2	1	109	64.2%	39.6%	0.0%	0.0%	50.5%
19) Columbia National Inc.	6	1	0	0	7	21	77	2	1	101	28.6%	1.3%	0.0%	0.0%	6.9%
20) Greisler Mortgage Corporation	0	0	0	0	0	7	88	0	2	97	0.0%	0.0%	0.0%	0.0%	0.0%
21) Norwest Mortgage, Inc.	1	5	0	0	6	12	74	0	1	87	8.3%	6.8%	0.0%	0.0%	6.9%
22) Home Savings Bank, SSB	0	1	0	0	1	4	80	0	0	84	0.0%	1.3%	0.0%	0.0%	1.2%
23) Triangle Bank	6	1	0	0	7	19	47	1	1	68	31.6%	2.1%	0.0%	0.0%	10.3%
24) Southern Bank and Trust Co.	4	3	0	0	7	8	52	0	0	60	50.0%	5.8%	0.0%	0.0%	11.7%
25) Trans Financial Mortgage Co.	0	1	0	0	1	0	46	0	1	47	0.0%	2.2%	0.0%	0.0%	2.1%
26) Wachovia Bank- North Carolina	3	1	0	1	5	7	29	0	8	44	42.9%	3.4%	0.0%	12.5%	11.4%
27) United Federal Savings Bank	3	1	0	0	4	7	34	0	0	41	42.9%	2.9%	0.0%	0.0%	9.8%

Source: RTKNet/KWA Inc.

1996. (Please note that because of the numerous entries, even for a few loans, it was decided by the Consultant to limit the analysis only to those lenders — depository and non-depository— which had actually originated at least 30 loans, regardless of the number of loan applications.) For ethnic minorities, loan denial rates ranged from as low as 0% to as high as 88.5% for some lenders. However, the actual number of applications, or attempts, at loans by minorities is generally lower than that for whites. Nevertheless, the information in Tables 3A and 3B, portrayed graphically in Chart 1, provides some indication of mortgage lending patterns and performance by institution, relative to ethnicity.

Tables 4A and 4B portray the total number and percent of total loan denials in 1996, by institution (i.e., with at least 30 originations). Overall, ethnic minorities make up a disproportionate share of total loan denials. This is especially notable since fewer loans are attempted by minorities.

Likewise, Tables 5A and 5B provide some indication of both the ethnic mix of the total loan population, and the individual institutions' service to, or market penetration, by ethnicity.

Again, as part of the Fair Housing Action Plan, this information suggests that some institutions may wish to take steps to increase their penetration into the ethnic minority community. It should be noted that in and of itself, the HMDA database does not prove the existence of

Chart 1: Loan Denial Rate by Ethnicity
Greenville, NC MSA, 1996

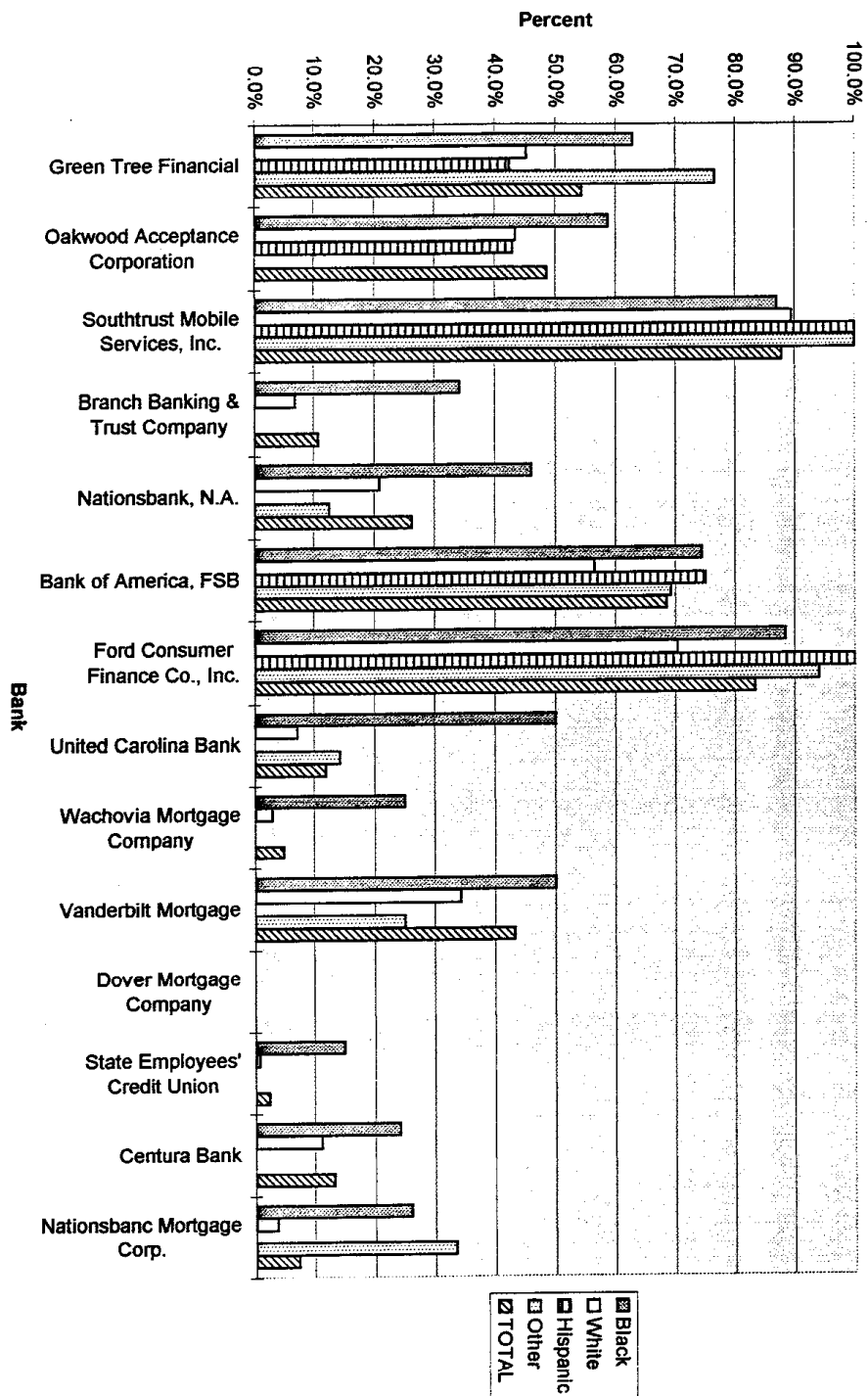


Chart1: Loan Denial Rate by Ethnicity
Greenville, NC MSA, 1996

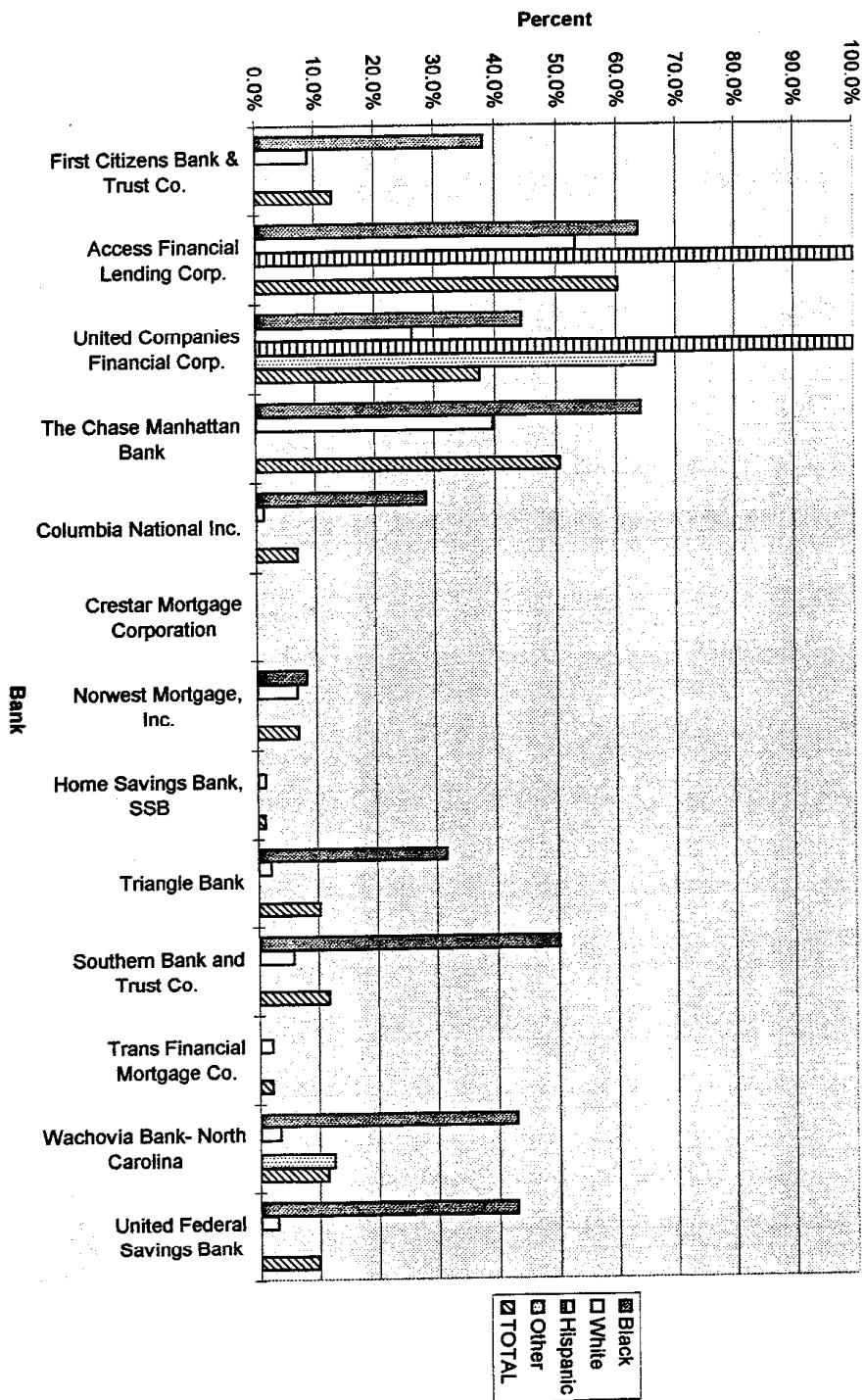


Table 4A: Alphabetical Listing

Lender	Total Loans Denied by Ethnicity				TOTAL	Percent of Loans Denied by Ethnicity			
	Black	White	Hispanic	Other		Black	White	Hispanic	Other
1) Access Financial Lending Corp.	51	26	2	0	79	64.6%	32.9%	2.5%	0.0%
2) Bank of America, FSB	116	44	3	9	172	67.4%	25.6%	1.7%	5.2%
3) Branch Banking & Trust Company	16	18	0	0	34	47.1%	52.9%	0.0%	0.0%
4) Centura Bank	7	16	0	0	23	30.4%	69.6%	0.0%	0.0%
5) Columbia National Inc.	6	1	0	0	7	85.7%	14.3%	0.0%	0.0%
6) Crestar Mortgage Corporation	0	0	0	0	0	0.0%	0.0%	0.0%	0.0%
7) Dover Mortgage Company	0	0	0	0	0	0.0%	0.0%	0.0%	0.0%
8) First Citizens Bank & Trust Co.	8	11	0	0	19	42.1%	57.9%	0.0%	0.0%
9) Ford Consumer Finance Co., Inc.	115	52	6	16	189	60.8%	27.5%	3.2%	8.5%
10) Green Tree Financial	406	278	11	13	708	57.3%	39.3%	1.6%	1.8%
11) Home Savings Bank, SSB	0	1	0	0	1	0.0%	100.0%	0.0%	0.0%
12) Nationsbank Mortgage Corp.	6	5	0	1	12	50.0%	41.7%	0.0%	8.3%
13) Nationsbank, N.A.	28	42	0	1	71	39.4%	59.2%	0.0%	1.4%
14) Norwest Mortgage, Inc.	1	5	0	0	6	16.7%	83.3%	0.0%	0.0%
15) Oakwood Acceptance Corporation	78	104	3	0	185	42.2%	56.2%	1.6%	0.0%
16) Southern Bank and Trust Co.	4	3	0	0	7	57.1%	42.9%	0.0%	0.0%
17) Southtrust Mobile Services, Inc.	213	76	6	1	296	72.0%	25.7%	2.0%	0.3%
18) State Employees' Credit Union	3	1	0	0	4	75.0%	25.0%	0.0%	0.0%
19) The Chase Manhattan Bank	34	21	0	0	55	61.8%	38.2%	0.0%	0.0%
20) Trans Financial Mortgage Co.	0	1	0	0	1	0.0%	100.0%	0.0%	0.0%
21) Triangle Bank	6	1	0	0	7	85.7%	14.3%	0.0%	0.0%
22) United Carolina Bank	12	14	0	1	27	44.4%	51.9%	0.0%	3.7%
23) United Companies Financial Corp.	31	15	1	2	49	63.3%	30.6%	2.0%	4.1%
24) United Federal Savings Bank	3	1	0	0	4	75.0%	25.0%	0.0%	0.0%
25) Vanderbilt Mortgage	60	27	0	1	88	68.2%	30.7%	0.0%	1.1%
26) Wachovia Bank- North Carolina	3	1	0	1	5	60.0%	20.0%	0.0%	20.0%
27) Wachovia Mortgage Company	5	5	0	0	10	50.0%	50.0%	0.0%	0.0%

Source: RTKNet/KWA Inc.

Table 4B: Ranking by Total Denials

Lender	Total Loans Denied by Ethnicity				TOTAL	Percent of Loans Denied by Ethnicity			
	Black	White	Hispanic	Other		Black	White	Hispanic	Other
1) Green Tree Financial	406	278	11	13	708	57.3%	39.3%	1.6%	1.8%
2) Southtrust Mobile Services, Inc.	213	76	6	1	296	72.0%	25.7%	2.0%	0.3%
3) Ford Consumer Finance Co., Inc.	115	52	6	16	189	60.8%	27.5%	3.2%	8.5%
4) Oakwood Acceptance Corporation	78	104	3	0	185	42.2%	56.2%	1.6%	0.0%
5) Bank of America, FSB	116	44	3	9	172	67.4%	25.6%	1.7%	5.2%
6) Vanderbilt Mortgage	60	27	0	1	88	68.2%	30.7%	0.0%	1.1%
7) Access Financial Lending Corp.	51	26	2	0	79	64.6%	32.9%	2.5%	0.0%
8) Nationsbank, N.A.	28	42	0	1	71	39.4%	59.2%	0.0%	1.4%
9) The Chase Manhattan Bank	34	21	0	0	55	61.8%	38.2%	0.0%	0.0%
10) United Companies Financial Corp.	31	15	1	2	49	63.3%	30.6%	2.0%	4.1%
11) Branch Banking & Trust Company	16	18	0	0	34	47.1%	52.9%	0.0%	0.0%
12) United Carolina Bank	12	14	0	1	27	44.4%	51.9%	0.0%	3.7%
13) Centura Bank	7	16	0	0	23	30.4%	69.6%	0.0%	0.0%
14) First Citizens Bank & Trust Co.	8	11	0	0	19	42.1%	57.9%	0.0%	0.0%
15) Nationsbank Mortgage Corp.	6	5	0	1	12	50.0%	41.7%	0.0%	8.3%
16) Wachovia Mortgage Company	5	5	0	0	10	50.0%	50.0%	0.0%	0.0%
17) Columblie National Inc.	6	1	0	0	7	85.7%	14.3%	0.0%	0.0%
18) Southern Bank and Trust Co.	4	3	0	0	7	57.1%	42.9%	0.0%	0.0%
19) Triangle Bank	6	1	0	0	7	85.7%	14.3%	0.0%	0.0%
20) Norwest Mortgage, Inc.	1	5	0	0	6	16.7%	83.3%	0.0%	0.0%
21) Wachovia Bank- North Carolina	3	1	0	1	5	60.0%	20.0%	0.0%	20.0%
22) State Employees' Credit Union	3	1	0	0	4	75.0%	25.0%	0.0%	0.0%
23) United Federal Savings Bank	3	1	0	0	4	75.0%	25.0%	0.0%	0.0%
24) Home Savings Bank, SSB	0	1	0	0	1	0.0%	100.0%	0.0%	0.0%
25) Trans Financial Mortgage Co.	0	1	0	0	1	0.0%	100.0%	0.0%	0.0%
26) Crestar Mortgage Corporation	0	0	0	0	0	0.0%	0.0%	0.0%	0.0%
27) Dover Mortgage Company	0	0	0	0	0	0.0%	0.0%	0.0%	0.0%

Source: RTKNet/KWA Inc.

Table 5A: Alphabetical Listing

Lender	Total Loans Originated by Ethnicity				Percent of Loans Originated by Ethnicity			
	Black	White	Hispanic	Other	Black	White	Hispanic	Other
1) Access Financial Lending Corp.	14	14	0	0	50.0%	50.0%	0.0%	0.0%
2) Bank of America, FSB	29	23	1	3	51.8%	41.1%	1.8%	5.4%
3) Branch Banking & Trust Company	24	220	1	2	9.7%	89.1%	0.4%	0.8%
4) Centura Bank	22	118	0	1	15.6%	83.7%	0.0%	0.7%
5) Columbia National Inc.	15	62	2	0	19.0%	78.5%	2.5%	0.0%
6) Crestar Mortgage Corporation	6	85	0	2	6.5%	91.4%	0.0%	2.2%
7) Dover Mortgage Company	45	153	1	2	22.4%	76.1%	0.5%	1.0%
8) First Citizens Bank & Trust Co.	12	108	1	1	10.0%	88.3%	0.8%	0.8%
9) Ford Consumer Finance Co., Inc.	7	13	0	0	35.0%	65.0%	0.0%	0.0%
10) Green Tree Financial	135	201	13	2	38.5%	57.3%	3.7%	0.6%
11) Home Savings Bank, SSB	4	71	0	0	5.6%	100.0%	0.0%	0.0%
12) Nationsbank Mortgage Corp.	14	117	0	2	10.5%	88.0%	0.0%	1.5%
13) Nationsbank, N.A.	24	128	0	6	15.2%	81.0%	0.0%	3.8%
14) Norwest Mortgage, Inc.	8	68	0	1	10.4%	88.3%	0.0%	1.3%
15) Oakwood Acceptance Corporation	29	80	2	0	26.1%	72.1%	1.8%	0.0%
16) Southern Bank and Trust Co.	4	47	0	0	7.8%	92.2%	0.0%	0.0%
17) Southtrust Mobile Services, Inc.	24	7	0	0	77.4%	22.6%	0.0%	0.0%
18) State Employees' Credit Union	17	148	2	0	10.2%	88.6%	1.2%	0.0%
19) The Chase Manhattan Bank	11	24	0	1	30.6%	66.7%	0.0%	2.8%
20) Trans Financial Mortgage Co.	0	45	0	1	0.0%	97.8%	0.0%	2.2%
21) Triangle Bank	13	43	1	1	22.4%	74.1%	1.7%	1.7%
22) United Carolina Bank	12	177	0	6	6.2%	90.8%	0.0%	3.1%
23) United Companies Financial Corp.	7	13	0	0	35.0%	65.0%	0.0%	0.0%
24) United Federal Savings Bank	3	28	0	0	9.7%	90.3%	0.0%	0.0%
25) Vanderbilt Mortgage	35	28	0	3	53.0%	42.4%	0.0%	4.5%
26) Wachovia Bank- North Carolina	4	25	0	7	11.1%	69.4%	0.0%	19.4%
27) Wachovia Mortgage Company	12	155	0	7	6.9%	89.1%	0.0%	4.0%

Source: RTKNet/KWA Inc.

Table 5B: Numerical Listing; Number of Loans

Lender	Total Loans Originated by Ethnicity					Percent of Loans Originated by Ethnicity				
	Black	White	Hispanic	Other	TOTAL	Black	White	Hispanic	Other	
1) Green Tree Financial	135	201	13	2	351	38.5%	57.3%	3.7%	0.6%	
2) Branch Banking & Trust Company	24	220	1	2	247	9.7%	89.1%	0.4%	0.8%	
3) Dover Mortgage Company	45	153	1	2	201	22.4%	76.1%	0.5%	1.0%	
4) United Carolina Bank	12	177	0	6	195	6.2%	90.8%	0.0%	3.1%	
5) Wachovia Mortgage Company	12	155	0	7	174	6.9%	89.1%	0.0%	4.0%	
6) State Employees' Credit Union	17	148	2	0	167	10.2%	88.6%	1.2%	0.0%	
7) Nationsbank, N.A.	24	128	0	6	158	15.2%	81.0%	0.0%	3.8%	
8) Centura Bank	22	118	0	1	141	15.6%	83.7%	0.0%	0.7%	
9) Nationsbank Mortgage Corp.	14	117	0	2	133	10.5%	88.0%	0.0%	1.5%	
10) First Citizens Bank & Trust Co.	12	108	1	1	120	10.0%	88.3%	0.8%	0.8%	
11) Oakwood Acceptance Corporation	29	80	2	0	111	26.1%	72.1%	1.8%	0.0%	
12) Crestar Mortgage Corporation	6	85	0	2	93	6.5%	91.4%	0.0%	2.2%	
13) Columbia National Inc.	15	62	2	0	79	19.0%	78.5%	2.5%	0.0%	
14) Norwest Mortgage, Inc.	8	68	0	1	77	10.4%	88.3%	0.0%	1.3%	
15) Home Savings Bank, SSB	4	71	0	0	71	5.6%	100.0%	0.0%	0.0%	
16) Vanderbilt Mortgage	35	28	0	3	66	53.0%	42.4%	0.0%	4.5%	
17) Triangle Bank	13	43	1	1	58	22.4%	74.1%	1.7%	1.7%	
18) Bank of America, FSB	29	23	1	3	56	51.8%	41.1%	1.8%	5.4%	
19) Southern Bank and Trust Co.	4	47	0	0	51	7.8%	92.2%	0.0%	0.0%	
20) Trans Financial Mortgage Co.	0	45	0	1	46	0.0%	97.8%	0.0%	2.2%	
21) The Chase Manhattan Bank	11	24	0	1	36	30.6%	68.7%	0.0%	2.8%	
22) Wachovia Bank- North Carolina	4	25	0	7	36	11.1%	69.4%	0.0%	19.4%	
23) Southtrust Mobile Services, Inc.	24	7	0	0	31	77.4%	22.6%	0.0%	0.0%	
24) United Federal Savings Bank	3	28	0	0	31	9.7%	90.3%	0.0%	0.0%	
25) Access Financial Lending Corp.	14	14	0	0	28	50.0%	50.0%	0.0%	0.0%	
26) Ford Consumer Finance Co., Inc.	7	13	0	0	20	35.0%	65.0%	0.0%	0.0%	
27) United Companies Financial Corp.	7	13	0	0	20	35.0%	65.0%	0.0%	0.0%	

Source: RTKNet/KWA Inc.

discriminatory practices. The indicators, however, may be used to identify possible patterns of racial discrimination in both the pre-application stage and in the loan decision making process, issues which should be addressed in a Fair Housing Action Plan.

As can be seen, in Tables 3, 4 and 5, loan performance indicators by ethnicity vary among the individual lenders. Some lenders appear to have a better lending pattern with minorities than others. For example, one lending institution actually reported, in 1996, a slightly higher loan denial rate for Whites than for Blacks. There are, nevertheless, some identifiable similarities or patterns of lending in the Greenville-Pitt County Consortium area. For example, it can be stated generally that:

- With most lenders, though not all, Blacks have a significantly higher chance of being turned down for a mortgage loan than for Whites. The graph in Chart 1 displays the disparities between the total denial rates of Blacks and Whites.
- In the general Greenville-Pitt County market area, Blacks are nearly three times (2.6) times as likely to be turned down for loans as Whites, (See Table 2, which shows the aggregated total lending activity for all lenders in the Greenville MSA for 1996).
- Some individual institutions have similar overall denial rates regardless of race. (See Tables 3 and 4).

- On a sub-geographical basis, i.e. by census tract, and regardless of income similarities, the overall loan-origination/denial rates by ethnicity, are about the same. (See Table 6, which shows loan information by Census Tract and 1990 Census Income designation). Notice Map 2, Census Tract Map.
- Whites in the low-mod census tract areas have a significantly higher probability of obtaining a mortgage loan than Blacks in the same income range. (see Table 6).

Table 6: Loan Origination/Loan Denial, by Ethnicity, by Census Tract

CENSUS TRACT	MEDIAN FAMILY INCOME	H, M, L, VL	LOAN ATTEMPTS		ORIGINATED		LOAN DENIAL RATE		DISPARITY RATIO
			Black	White	Black	White	Black	White	
1. 1	\$23,598	L	242	284	39	108	84%	62%	1.35
2. 2	\$32,039	M	51	160	6	108	88%	33%	2.67
3. 3	\$46,096	H	43	325	15	266	65%	18%	3.61
4. 4	\$51,302	H	9	39	1	34	89%	13%	6.84
5. 5	\$49,861	H	87	254	35	212	60%	17%	3.53
6. 6	\$39,341	H	126	298	53	218	58%	27%	2.15
7. 7	\$13,533	VL	292	186	64	67	78%	64%	1.22
8. 8	\$15,990	L	181	135	50	54	72%	60%	1.2
9. 10	\$40,592	H	94	386	37	264	39%	32%	1.22
10. 12	\$28,152	M	23	86	7	56	70%	35%	2
11. 17	\$36,419	H	27	54	15	43	44%	20%	2.2
12. 14*	\$25,424	M	179	279	51	137	72%	51%	1.41
13. 15**	\$27,798	M	143	155	47	90	67%	42%	1.6
14. 18***	\$26,877	M	183	186	40	107	78%	42%	1.86
15. 20****	\$23,192	L	228	246	57	124	75%	50%	1.5

* Includes Ayden Area

** Includes Grifton Area

*** Includes Farmville Area

****Includes Bethel Area

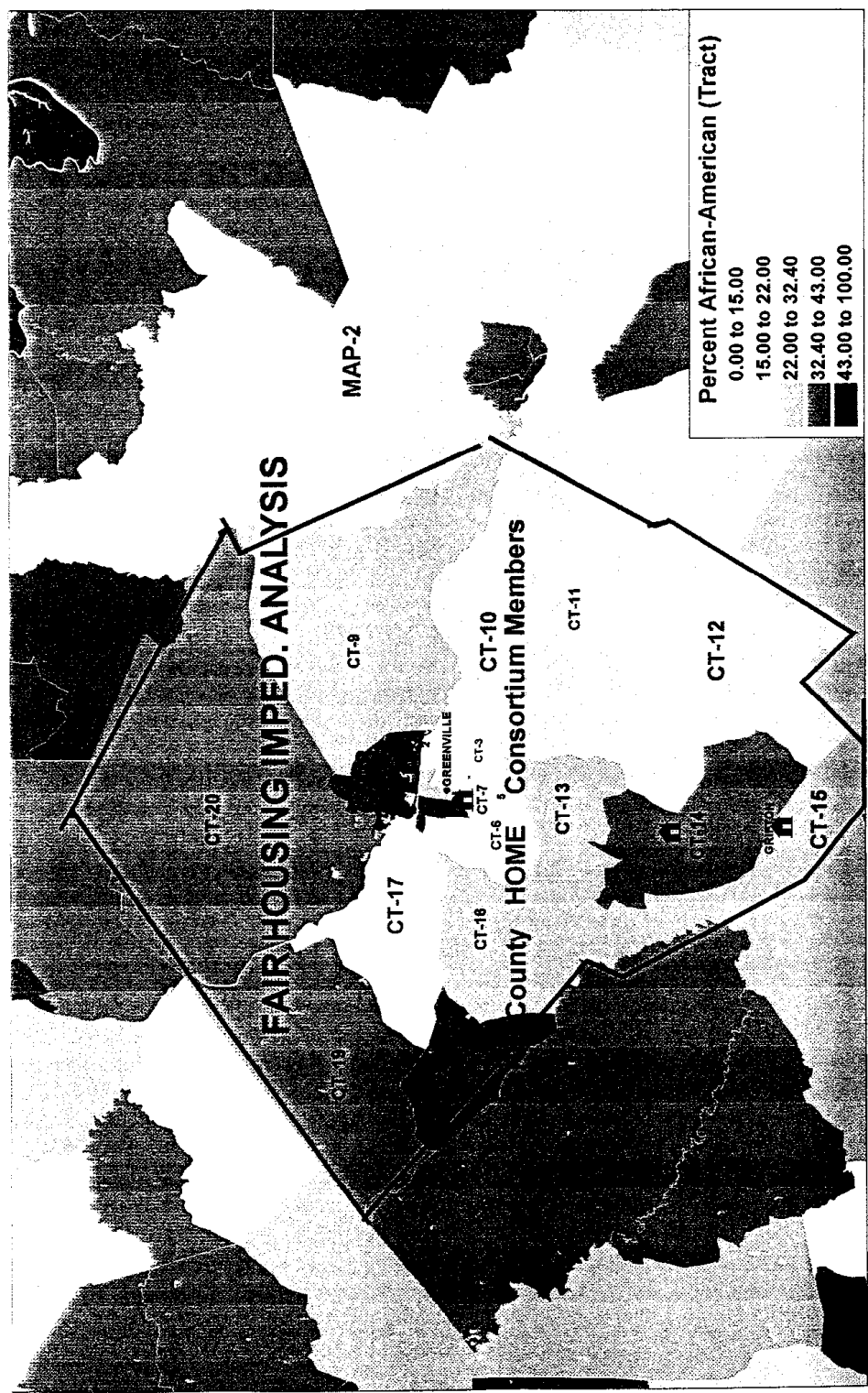
Census Tracts 10, 17, 12 -small portion in Greenville

H, M, L, VL denotes High, Medium, Low, Very Low

Note again that all the above statements extrapolated from analysis of the HMDA do not address "reasons" for denial. These factors could include poor credit history, high debt-to-income ratios, etc. However, because of the fairly consistent disparity between loan approval/denial rates for Whites compared to Blacks in the Greenville-Pitt County area, (as supported by the comments from the minority Realtors/brokers), it is "safe" to state the following:

"Apparent unequal access to mortgage financing from some lending institutions serving the Greenville-Pitt County area indicates the presence of a very real impediment to fair housing choice for Ethnic Minorities."

It is worth noting also, that numerically, in general fewer actual loan applications are submitted to lenders from Blacks and/or perhaps low to moderate income persons. Also, nearly every major lending institution has some type of "CRA Product" intended to encourage and facilitate more lending activity among minority and low-to-moderate income areas. The generally lower number of loan applications coming from Blacks and low-mod-income persons may be more indicative of a lack of confidence and "intimidation" in applying for loans. This further indicates a need for increased public/community education, awareness, and



outreach concerning loan opportunities and various loan products offered by the lenders. Increased public education/community awareness activities could be beneficial to both the lending institutions and the community.

2. Discriminatory Appraisal and Underwriting Practices

(Note: The following discussions are presented for information purposes)

In both appraisals and insurance underwriting, if disparities are imposed because of race, color, sex, national origin, or handicap, discrimination can result and therefore impede fair housing choice. Appraisals, which are used to assign and/or determine the market value (or tax value) of properties, if discriminatory, can have a seriously adverse impact on obtaining financing and possibly insurance on the property.

Actual underwriting requirements for homeowners' insurance are generally "closely guarded" by insurance companies but can be quite subjective in their application. These practices can, again, seriously impede fair housing choice. For example, notice the following:

Insurance companies use their own underwriting guidelines to select actual policyholders from the pool of customers applying for insurance. Thus, underwriting guidelines can also be used to specify those consumers a company does not wish to cover. Some of these guidelines may state that older homes, low-valued homes and/or homes located in economically depressed areas, will not be "acceptable" for homeowners coverage. Personal characteristics of the applicant, although illegal in most instances, may also be considered as part of the underwriting process.

Insurance agents are provided with underwriting guidelines for the companies they write for in order to determine whether a company will sell insurance to a particular applicant. Underwriting

guidelines are used to evaluate an application after it is forwarded to the company for approval. The guidelines are also used when a current policy is being reevaluated for renewal.

The office of Public Insurance Council for the state of Texas published in February, 1994, A Review of Homeowners Insurance Underwriting Guidelines Used in Texas. Though perhaps not directly applicable to Greenville or the PCC, some of the findings are illustrative of possible discriminatory practices: (Keep in mind that the references are to insurance companies underwriting homeowners' insurance in Texas only). Notice the excerpt below from page 4 of the report:

- *"A large portion of the homeowners insurance market has underwriting guidelines that refuse to renew a policy if the policyholder files multiple claims (more than two claims in three years) or refuse to issue a new policy if the applicant has an unacceptable claims history (as few as one claim) with a previous insurer.*
- *Filing a claim during the first 90 days of a policy may result in cancellation. Texas law allows insurers to cancel a policy for any reason except illegal discrimination during the first 90 days the policy is in force.*
- *Low income and minority urban communities, as well as elderly consumers, are disproportionately affected by guideline restrictions on older, lower-value homes in economically depressed areas.*

- *Rural communities may also be disproportionately affected by guideline restrictions on older homes and fire protection requirements.*

- *Some guidelines may deny coverage to consumers who are in non-traditional familial relationships but refusing to cover unrelated people as co-insureds and limiting the number of "families" in a single dwelling. These guidelines categorically deny coverage to gay and lesbian families and other non-related individuals who combine households.*

- *A number of underwriting guidelines require the agent to make a 'subjective' judgment about the applicant's lifestyle, stability and morals.*

- *A few insurance companies use illegal underwriting guidelines restricting coverage based on marital status and nationality."*

In North Carolina, chapter 58 of the North Carolina General Statutes, in Article 63, contains specific prohibitions against "Unfair Trade Practices." The following is an excerpt from Article 63: (63-57(7) (d)), under "Unfair Trade Practices:"

"Making or permitting any unfair discrimination between or among individuals or risks of the same class and of essentially the same hazard by refusing to issue, refusing to renew, canceling, or limiting the amount of insurance coverage on a residential property risk, or the personal property contained therein, because of the age of the residential property, unless:

1. *The refusal or limitation is for the purpose of preserving the solvency of the insurer and is not a mere pretext for unfair discrimination, or*
2. *The refusal, cancellation, or limitation is required by law."*

In March 1993, the Market Analysis Unit of the North Carolina Department of Insurance released the Residential Property Insurance Availability Study, which was based on surveying a number of insurance policies in the State. Special emphasis was placed on terminations. Some excerpts from the report are presented below:

"A review of policies, applications and cancellation notices was made during the target examinations to ascertain the reason for individual policy rejection..."

"Cancellations, nonrenewals, and rejections were reviewed at each company. A total of 1,175 terminations were reviewed. Of these, 1,013 were terminated for underwriting reasons summarized below:

<u>Reason</u>	<u>Number</u>	<u>Percentage</u>
1. Does not meet underwriting requirements	232	22.9%
2. Claims or losses	186	18.4%
3. Not owner occupied or vacant	175	17.2%
4. Unfavorable credit report	171	16.9%
5. Agent no longer represents company	107	10.6%
6. Does not meet minimum Coverage A requirements	44	4.3%
7. No supporting business	25	2.5%
8. Liability exposure	23	2.3%
9. Commercial exposure	21	2.1%
10. Age of home	17	1.7%
11. Geographic location	5	.5%
12. Other reasons	7	.7%

"Five of the terminated policies reviewed made specific reference to geographic reasons for termination; however, the companies provided additional reasons for termination in each case. The reasons for termination indicated in those files were as follows:

1. *"Poor neighborhood and upkeep of home."*
2. *"Bad area claims"*
3. *"Losses, 3 burglary claims in 2 years and house is located in crime area with drug traffic close by."*
4. *"Named insured died... 1953 house, lower value...typical of area - loss problem, 2 already, small but frequency is the problem."*
5. *"Risk is uninsurable, high risk area. Directly across street from low income housing project apt. complex. House directly next to insured vacant and boarded up - open to transients etc. Also, insureds obviously unable to upkeep and maintain dwelling. Roof completely worn out. Interior plaster ceilings and walls cracked and damaged from water leaking through the roof. Insureds appear to be honest people doing the best they can but obviously just do not have enough money to upkeep dwelling. High risk area and poor maintenance."*

In North Carolina, as in other states, the variety of insurance products and related underwriting criteria varies widely from company to company. The basic legal criterion, in oversimplified terms, is that property underwriting and insurability guidelines cannot be based on any thing except the property itself. So, if a potentially insured property owner was denied coverage on the basis of race, sex, sexual orientation, national origin, handicap,

etc., discrimination would result because these factors have nothing to do with the property itself. Such denials, if made, would be based on personal characteristics.

At the same time, however, there are so many "legal" criteria and insurability standards set by each insurance company, based on the individual product, that "covert" or indirect discrimination could easily occur. For example, if a company insures only houses over a certain dollar value, such criteria from that particular company would be "exclusionary" in effect for lower value homes, but nevertheless legal.

Therefore, in Greenville and within the Consortium, as in other cities in North Carolina, discrimination most likely does exist, but is very difficult to detect even if challenged. (Notice: There is a division within the North Carolina Insurance Commission which handles consumer complaints. Those suspecting discrimination in the application of insurance coverage should call: 1-800-JIM-LONG).

3. Disinvestment and Redlining Practices

a. Disinvestment

The negative phenomena of "disinvestment" of a neighborhood or community can occur from a combination of a number of socioeconomic and market forces. Unfair lending practices can also contribute to disinvestment. For a brief summary of "what is disinvestment?" notice the following notes extrapolated from information provided by the National Community Reinvestment Coalition:

- Market forces are not operating to support economic growth and the community is less competitive.
- As a result, a "disinvested community" is one where the capital has ceased flowing.
- It refers to the situation where financial institutions—like banks and savings and loans discourage or place unusual conditions on making loans in low-income areas, minority neighborhoods, or central cities.
- In this case, local capital increasingly slows down, via banks' use of residents' checking and savings account assets. Home mortgages and improvement loans dry up, which encourages homeowners and home buyers—the areas middle class—to leave. (Ironically, oftentimes the "ownership" is replaced by non-minority, and low-moderate income persons).

- Business capital becomes scarce, inhibiting venture start-ups and pressuring successful small businesses to relocate.
- Physical improvement capital disappears, adding to the deterioration (in appearance and value) of housing and business structures.

(Excerpt from Handouts at "1996 Fair Housing Summit:"
Durham, NC)

Historically, there are indications of disinvestment in some minority concentrated areas of both Greenville and of some of the smaller municipalities within the Consortium. Older, deteriorating neighborhoods which have been the subject of Community Revitalization projects in Greenville, Ayden, Bethel, Farmville, and Grifton, provide some indication. However, because of other socioeconomic factors, it is difficult to draw direct correlations with "intentional" unfair lending practices. More so, the phenomenon may be even more difficult to assess in the outlying communities of Pitt County, outside of Greenville and the incorporated municipalities, where there are fewer minority, low-income concentrated areas.

b. Redlining

As noted earlier, the Community Reinvestment Act (CRA) was enacted to address issues of redlining and under investment in minority and low-income neighborhoods. The previously referenced Home Mortgage Disclosure Act data (HMDA) reported by qualified lenders, also contains

indicators of "geographic" loan performance since the information is also reported by census tract. For example, the summary lending data reported by Census Tract for the Greenville MSA, implicated that a generally lower number of loan originations occur in minority and low to moderate income areas. At the same time, however, a substantial number of loan applications are attempted from these same areas.

Indications for possible "redlining" of areas by race and/or income are not totally clear, although implied by input from minority brokers. As with mortgage lending in general in the Pitt County-Greenville area, there is a need for increased education, public awareness, and loan outreach activities for the minority and/or low income segments of the community.

4. Racial Credit Steering

This is a practice whereby lenders and/or Real Estate agents "steer" potential loan applicants away from conventional sources of lending capital, for no apparent reason. For example:

- "I'll refer you to an FHA lender for pre-qualifying..."
- "Let me send you down to the Farmer's Home Administration Office."

If such practices occur, for no apparent reason other than race, gender, etc., then discriminatory steering may result. Again, this is another area which was not reported on in Greenville or within the Consortium, which is very difficult to detect. In reality, however, it may occur. The difficulty comes about, because there may be

actual, legitimate reasons for referrals to financing alternatives, related more to income but which may also overlap race etc. Again, more monitoring needs to take place.

E. Available Information on Fair Housing Complaints, Violations, or Suits Against the City

There is no available record of fair housing complaints, suits, or grievances filed against the City, itself. The City of Greenville is the designated Lead Entity of the Consortium. As noted previously, the Human Relations Office is officially designated to receive complaints from citizens. This office maintains records of all complaints, most of which do not relate to discrimination.

F. Degree of Segregation; Racial Violence

(This subject is discussed in the Demographic/Economic Overview section of this report, prepared with assistance from the NC Fair Housing Center. Notice the following:)

The Raleigh based NC Institute for Minority Economic Development, (NCIMED), recently released a study and report titled Residential Segregation in North Carolina: A Barrier to African-American Opportunities. This study, based on an analysis of 1990 US Census data, developed indices for the percentage of African Americans who would have to move in order to achieve complete integration in 99 of the state's 100 counties. For example, according to this criteria, Wake County was more "integrated," with a 65% score, than Guilford County, which had an index of 73%, i.e. the percent of minorities having to move in order to

achieve integration. According to this study, the index for Pitt County is 68%.

Sixty-eight percent of all blacks living in Pitt County would have to move in order to achieve racial balance. Further Pitt County is highly segregated based upon the isolation index. This conclusion is based on the aforementioned study conducted by Lance Freeman of the North Carolina Institute for Minority and Economic Development (NCIMED)¹. The "dissimilarity index" is a measure of evenness, and is an indicator of whether a particular group is evenly distributed over geographic units. This index has values ranging from 0 (perfect integration) to 1 (complete integration). A score of .6 is considered highly segregated. Pitt County has a score of .68. These figures are representative of the number of blacks who would have to move in order to achieve racial integration.

When it comes to racial violence, none was reported as part of this study.

G. CDBG Contract Conditions from HUD, or Failure to Comply with Fair Housing Certifications

As noted in the City's and the Pitt County Consortium's FY 1999-2004 Consolidated Plan, there are no court orders, consent decrees, or sanctions currently imposed on the City of Greenville or the rest of the Consortium, which affect the provisions of assisted housing or fair housing remedies in the delivery of affordable housing.

1. CDBG/HOME Administrative Policies Which Affect Minority Households Choice of Housing Locations

In some cases, in the administration of HOME or CDBG programs, especially with regards to acquisition-demolition-relocation, local policies can limit the client's choice of housing location. For example, a target area is a minority and/or low-income concentrated area, and a relocatee is, by policy, placed in the same area, then the policies would limit the relocatee's choice. However, there is no indication that this is the case in Greenville or in the Consortium.

H. Overview: Fair Housing Concerns, Problems, Impediments

Some Fair Housing problems do exist in Greenville's and the balance of the Consortium's jurisdiction. Below is a "re-cap" or summary of each of the major areas reviewed in the preceding analysis. The intent is to clearly delineate identified impediments, concerns, and problems which need to be addressed.

1. Public Policies

No easily detectable impediments appear in this area, i.e., land use regulations and building codes, from Greenville or from other jurisdictions within the Consortium.

2. Institutional Practices - Real Estate

Based on discussions with minority real estate professionals, human service agency representatives, in buying, selling, renting and input from appropriate City staff, several incidences of what appears to be discriminatory actions were reported. Some evidence of racial steering was presented. Also disparities in fairness of appraisals and property insurance was implied by minority real estate professionals.

Such practices, even if only limited and occurring occasionally is an impediment to Fair Housing choice in Greenville and in the Consortium.

3. Lending Institutions

A review of the data included in the Home Mortgage Disclosure Act reports for 1996 by Greenville's major lending institutions, indicated that disparities in accessibility to home mortgage

financing, by race, income, and geographic concentrations are very real impediments to Fair Housing choice in the greater Greenville area. This is indicated by the 1996 HMDA data by Census Tracts.

4. Prior Fair Housing Complaints

The incidence of prior fair housing complaints does not appear to be a major factor in fair housing choice among the mostly rural consortium member jurisdictions. Although there have been some fair housing complaints historically in the City of Greenville, most were resolved locally, with a few being referred to the NC Human Relations Commission. As noted in earlier discussions, the majority of the complaints received by the City, and/or the Association of Realtors, concern landlord/tenant relations where "protected status" is not an issue.

5. Segregation and Racial Violence

It is likely that the historically segregated neighborhood pattern in Greenville and other jurisdictions (except Pitt County), has had a definite impact on fair housing choice in Greenville and in the Consortium.

6. CDBG Contract Compliance and/or Administrative Policies

This issue and/or related policies at this point also do not appear to be a major factor in prohibiting fair housing choice in Greenville, as the Consortium's Lead Entity. Also, the Consortium is still a new entity.

I. Impediments to Fair Housing Choice based on Protected Status

1. Race

One of the great historical impediments to fair housing choice for minorities is residential segregation and the underlying economic disparities that foster it. A recent study by the Institute for Minority Economic Development (IMED) suggests that in areas where the economic differences between the races are relative large blacks of all socio-economic classes will be highly segregated from the whites. Redlining and intentional discrimination were implicated as possible impediments to fair housing choice in the Greenville area. Anecdotal information suggests that there is some intentional steering in the Greenville area housing market. Also, input from minority real estate professionals presented personal observations of racially unfair lending and/or brokerage practices. Further, a review of HMDA data showed that there was an overall significant difference in loan denial rates between blacks and whites regardless of income. This factor provides a strong indication that illegal lending discrimination imposes a barrier to fair housing choice within Greenville and the Consortium. There are also statistically significant differences in homeownership rates of minorities and non-minorities (see Section III, Demographic Analysis). Again, these patterns could, perhaps, indicate redlining, discriminatory appraisal practices and lending discrimination.

2. National Origin

The Hispanic population in the Consortium is approximately 1% of the overall population. Hispanics face unique barriers to fair housing choice. Many of the Hispanics who come to the area are migrant, but a permanent population is beginning to establish roots in the community.

Very few housing providers advertise to have printed material in Spanish, fewer still have agents who can communicate with homeseekers. Another impediment to fair housing for this group is a reluctance to exercise their fair housing rights. Many in this group have come to this country to avoid tyranny and abuse, and are, therefore, less willing to file a complaint for fear of reprisal. Analysis of lending patterns, i.e. 1996 HMDA data, showed disproportionately higher loan denial rates for Hispanics in general.

3. Familial Status

Large families in Greenville and in the smaller jurisdictions which comprise the Consortium, still have difficulty finding affordable units, according to the survey input. Unreasonable occupancy standards may also be an issue for these families. There can be a great deal of opposition to multi-family housing development by neighbors who may not want the influx of children in their neighborhoods. However, no direct evidence of large family discrimination was detected during this analysis.

4. Persons with Disabilities

NIMBYism usually has the greatest effect on persons with disabilities particularly those living in a group home setting. Generally, there is not opposition to housing, only..."Not in my backyard."

5. Person with AIDS and Related Diseases

In the current Consolidated Plan, a fairly detailed discussion on persons with HIV/AIDS is presented. The discussion showed that the number both reported HIV and AIDS cases and patients has grown in Pitt County. There

are no precise numbers on how many are homeless or non-homeless. For the homeless HIV/AIDS victims, the basic needs are obvious as discussed in the Consolidated Plan narrative, i.e. adequate housing facilities, including SRO units. Among the non-homeless, however, the supportive housing needs are not so obvious. The Pitt County Aids Service Organization (PICASSO), an agency serving the Consortium region and based in Greenville, provides a variety of supportive services to HIV/AIDS patients.

Among these Services are case management/benefits advocacy, medical, legal, and counseling assistance, and transportation, etc. However, housing and housing support, according to PICASSO's director are the most crucial and persistent problems. There is a need to find or develop housing conducive for providing proper in-house care. For the advanced cases of AIDS, there is a need to find or develop hospice-type care facilities. At the same time, there is a need for independent living facilities for advanced or "full-blown" AIDS cases, as well. There were no cases of overt discrimination reported during this analysis.

6. Persons with Physical Disabilities

For persons with physical disabilities the challenge is to find an accessible or adaptable unit at an affordable rent. Many persons with disabilities are faced with landlords' perceptions that persons with disabilities will require more attention than other tenants. Many assisted housing complexes for the elderly and persons with disabilities do not take into account that the disabled may have children. The current Consolidated Plan reported that there is also a lack of an adequate housing supply for persons with developmental disabilities in Greenville and in the Consortium.

7. Sexual Harassment

There is a concern that with the increase in female headed households who fall below the median family income, that there will be an increase in the number of reported incidents of sexual harassment. Women in these households are vulnerable to Quid Quo Pro sexual harassment. This form of discrimination takes place most often when a landlord offers to reduce rents or to accept in lieu of rent sexual favors from the tenant. However, there were no direct reports or indication of this form of Fair Housing violation.

8. Color and Religion

No incidents of color or religious discrimination were reported or detected in this area, during the analysis.

J. Delineation of Impediments

As a result of this analysis, the following are identifiable impediments to Fair Housing Choice in the City of Greenville and the Pitt County Consortium:

1. According to analysis of the HMDA data for 1996, disparity and inequity in obtaining mortgage financing from several major lending institutions is an impediment to Fair Housing Choice in both Greenville and in the balance of the Consortium.
2. Non-representative, i.e., low number and percent of loans originating in census tracts with greater than 50% minority

population is also an impediment to Fair Housing Choice in the Greenville, MSA. (Pitt County Consortium area).

3. Indications of disparities in appraisals and property insurance (based on input from minority real estate professionals), are also impediments to fair housing choice in Greenville.
4. The historical segregated patterns, among some member jurisdictions, have also been an impediment to fair housing choice.

These factors are considered to be the major impediments to be addressed in a Fair Housing Plan of Action for Greenville the Pitt County Consortium. Some additional concerns and problems noted in the survey results and which should also be addressed include:

- Need to increase the supply of affordable housing (renters and buyers), for low and moderate-income households.
- Economic/income barriers to housing affordability, i.e., low/moderate incomes.
- Lack of awareness of housing programs and banking/lending services, products.
- Need to increase the supply of "accessible" housing for handicapped citizens.

All of these impediments and concerns will be addressed in later sections of this report.

The next narrative section will present a demographic analysis of Greenville and the Pitt County Consortium's jurisdiction, examining certain socioeconomic factors relevant to the interrelated dynamics of housing markets and housing choice.

III. DEMOGRAPHIC ANALYSIS

A. Jurisdictional Overview

The Pitt County Consortium (PCC) consists of six (6) jurisdictions within Pitt County, North Carolina, with the City of Greenville being the Lead Entity. The City of Greenville located on the banks of the Tar River near the center of the County, is also the economic and cultural focus of the Consortium.

1. Population Trends

The total estimated population of the Consortium jurisdictions shown in Table 7 reflects significant growth since the 1990 US Census. In 1990, the total population of the county, (including Greenville and the several municipalities not part of the Consortium), was 107,924. In 1996, according to the NC Municipal Population office of State Planning, the combined total was 119,236, an increase of 11,312 persons, or 10.5%. All of the communities within the Consortium experienced positive population growth except Farmville, which, according to State estimates, had a net loss of only four persons. The overall population trend appears to be one of growth for the Consortium members.

Table 7: PCC Member Jurisdictions:

<u>Member</u>	<u>Est. Home Population</u>	<u>Pct. Total</u>
1. Greenville	58,900	49.4
2. County of Pitt*	46,550	39.0
3. Town of Ayden	4,898	4.1
4. Town of Bethel	1,897	1.6
5. Town of Farmville	4,442	3.7
6. Town of Grifton	2,549	2.1
Total	119,236	100%

Source: 1996 North Carolina Municipal Population Office of State Planning.

* Balance of Pitt County; includes municipalities not currently part of the Consortium

2. General Racial Composition

General racial composition in the Consortium area, according to 1990 census figures, range from nearly 33.3% Black in Pitt County to 56% in the Town of Bethel. Generally, the percent of Black population in each of the six (6) jurisdictions is significantly higher than the statewide percentage of 22%, (see Table 2, below).

Although Pitt County appears to be experiencing an increase in the Hispanic population, the actual numbers remain relatively small.

The 1990 Census reported a total of 977 (0.9%) Hispanic persons in Pitt County.

Table 8: Race & Median Age of Population

<u>Jurisdiction</u>	<u>Total 1990 Pop</u>	<u>No. White</u>	<u>No. Black & (%)</u>	<u>Median Age of Pop.</u>
1. Greenville	44,972	28,867	15,337(34.1%)	25.5
2. Pitt County*	49,585	34,809	14,238 (28.7%)	29.5
3. Ayden	4,740	2,324	2,404 (50.7%)	33.4
4. Bethel	1,842	807	1,032 (56.0%)	35.7
5. Farmville	4,392	2,345	2,024 (46%)	37.1
6. Grifton	2,393	1,491	886 (37.0%)	37.3
7. NC		(75.6%)	(21.9%)	(33.1)

Source: US Census: 1990; * Includes entire balance of Pitt County

3. Household Trends

The average household size within the Consortium is 2.53 persons per household (1990 Census), which is comparable to 2.54 for the State. The number of households in the area generally has been increasing, while the size of families has been decreasing. This is a national trend, and, as is the case within the Pitt County Consortium, is resulting in increased demand for individual dwelling units. As Table 9 shows, the largest average household sizes exists in Bethel, at 2.7 persons per household, and the smallest in Greenville, with 2.35. *(Note again, that Greenville has a high student population, due to the presence of East Carolina University).*

Table 9: Household (HH) Trends Indicators, PITT COUNTY Consortium: (1990 Census)

Jurisdiction	No. HH	Avg. HH Size
1. Greenville	17,017	2.35
2. Pitt County*	18,245	2.53
3. Ayden	1,795	2.64
4. Bethel	709	2.72
5. Farmville	1,804	2.43
6. Grifton	921	2.51
7. NC		2.54

Source: 1990 US Census; * Includes entire balance of Pitt County

4. Income and Poverty Trends:

The 1990 below poverty rates in the area ranged from 19.7% of the population in Farmville, to 26.6% of the population in the City of Greenville. All of the member jurisdictions have poverty rates above the average 12.5% rate for North Carolina as a whole (see

Table 10, below). An examination of poverty statistics is significant, because there is a strong correlation between housing affordability and income.

Table 10: Income and Poverty Status Summary (1990 Census)

Jurisdiction	MFI (All)	% Below Poverty (All)	% Below Poverty (Black)
1. Greenville	32,323	26.6	36.7
2. Pitt County	30,166	22.1	37.3
3. Ayden	22,733	24.9	48.2
4. Bethel	23,317	23.2	38.4
5. Farmville	26,292	19.7	37.8
6. Grifton	28,214	20.1	39.8
7. NC	31,548	12.5	N/A

Source: 1990 US Census: MFI=Median Family Income; N/A=Not Available

The 1995 per capita income for the area was \$19,318 in Pitt County. The State's per capita income was \$21,079. According to state estimates, the 1995 annual average wage for the area was \$22,616 for Pitt County. The State's annual average for the same year was \$24,374. Median Family Income (MFI) for the Consortium, according to the 1990 Census, and as indicated in Table 10, ranged from a low of \$22,733 in Ayden to \$32,323 in Greenville. The MFI for Pitt County was close to that of the state's overall, whereas Greenville's MFI actually exceeded that of the state's overall. Most of the jurisdictions, however, have MFI levels significantly lower than both State and National levels. This indicates significant housing "affordability" problems throughout the area, due to limited income. In terms of race, Black Median Family Income was substantially lower than the MFI for *all* families, and the *percent* of black persons below the poverty rate was substantially *higher* than the rate for all persons.

5. Economy: General

The economy throughout the Consortium has historically been primarily agrarian-based, with tobacco and tobacco services as the anchor. However, the economy of Pitt County, primarily because of Greenville, is becoming increasingly diversified. Farming and agricultural services are still prominent features in the local economy of the county, but manufacturing is becoming the dominant economic sector throughout. Many residents in the smaller towns and those residing outside of the urbanized area of Greenville commute to work to such companies as Yale Materials, Rubber Maid and Proctor & Gamble. Pitt County is growing, with more economic expansion occurring in the City of Greenville, mainly due to East Carolina University and The School of Medicine. The three economic sectors with the highest percentage of jobs (1990 US Census statistics) are Retail (22.4%); Educational Services (18.1%), and Manufacturing (15.4%).

6. Selected Housing Need Indicators: Entire Consortium

Selected data items from the US Census provide more indications of housing needs among the Consortium's jurisdictions. These selected items are presented in Table 11 below, i.e., the incidence of overcrowding, (more than 1.01 persons per room); units lacking complete indoor plumbing; and units lacking complete kitchen facilities.

Table 11: Selected Housing Need Indicators: Entire Consortium

Jurisdiction	Overcrowding (% W+ 1.01 pp/rm.)	Units Lacking Complete Plumbing	Units Lacking Complete Kitchen Fac.	Age of Housing Stock %1980-90/ before 1940	
1. Greenville *	62/ 3.6	64/4	132/8	31.7	4.3
2. Pitt Co.	1650/4.1	728/1.8	553/1.4	32.9	7.0
3. Ayden	102/5.7	20/1.1	31/1.7	15.4	13.0
4. Bethel	34/4.8	5/7	6/8	14.3	16.6
5. Farmville	81/4.5	0	0	14.5	11.8
6. Grifton	33/3.6	9/1.0	19/2.1	14.1	3.8
7. NC	2.9 %	1.5	1.2	28.6	9.9

Source: 1990 Census of Population and Housing

**(Due to the presence of a high student population and the likelihood of more occupants per dwelling unit.)*

Prior to becoming part of the Pitt County Consortium, at various times most of the five (5) other jurisdictions (excluding Greenville in recent years, which became a HUD Entitlement City in 1994) have participated in the State-administered Small Cities Community Development Block Grant (CDBG) program, or other housing grant programs. As part of the Small Cities application or other similar grant applications, some needs analysis is required. Also, as will be discussed in the next section, each recipient jurisdiction of Small Cities Block Grant funds was responsible for adopting a "basic" Fair Housing Plan.

IV. ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS/ACTIVITIES IN GREENVILLE

Greenville has been involved in a number of fair housing programs and activities for many years, even prior to becoming an Entitlement City. In June, 1990, while still under the Small Cities Program, the City adopted a "Fair Housing Plan." This Plan had the following goals and objectives: "To eliminate discrimination and unfair treatment in the provision of sale or rental housing in the Greenville community. Program objectives:

1. To provide assistance to residents in the resolution of housing complaints.
2. To assess community housing needs for the development of future housing strategies.
3. To provide educational opportunities for increasing citizen awareness of Fair Housing Laws.
4. To develop a Fair Housing Ordinance." (see Appendix 2)

Although none of the other member jurisdictions are HUD Entitlement cities, nearly all of them have, at various times, participated in the Community Development Small Cities Block Grant Program. This program, administered by the State of North Carolina, also requires grant recipients to address fair housing issues. This section will present a brief overview of current activities in both the public and private sectors.

A. Public

1. City of Greenville

The City of Greenville's Human Relations Office, as discussed previously, is the officially designated City agency responsible for receiving Fair Housing Complaints.

Since 1993 the Human Relations Office has filed approximately 10 fair housing complaints with the NC Human Relations Commission. On average the Greenville's Human Relations Board receives 6 tenant/landlord disputes per month regarding maintenance and upkeep of rental property.

The Human Relations Office conducts educational workshops and seminars on fair housing issues. Attendees of the workshops are those obeying fair housing laws; therefore, continuing education is a necessity, in order to reach those engaged in discriminatory acts. The Human Relations Specialist is presently drafting a Fair Housing Ordinance for consideration of adoption by the City of Greenville.

2. The Balance of Consortium's Communities

Several local government/member jurisdictions have received grant funds under HUD's Small Cities Community Development Block Grant (CDBG) Program, administered by the State. The State, as the main grant recipient from HUD, has Fair Housing responsibilities and in turn imposes fair housing requirements on sub-recipients. Each recipient of small cities' funds had to develop a "Plan to Further Fair Housing." The guidelines for developing these plans cover all of the basic elements of fair housing planning except for requiring analyses of impediments. The five (5) major areas addressed by these Fair Housing Plan guidelines:

- a) Indicate is the grantee will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.*

- b) Identify and Analyze obstacles to affirmatively furthering fair housing in grantee's community.*
- c) Briefly describe the activities that the grantee will undertake over the active period of the grant to affirmatively furthering fair housing in their community. A time schedule for implementation of these activities must be included. Activities must be scheduled for implementation at least on a quarterly basis.*
- d) Will the above activities apply to the total municipality or county? If no, provide explanation.*
- e) Describe grantee's method of receiving and resolving housing discrimination complaints. This may be either a procedure currently being implemented under this CDBG grant. Include a description of how the grantee informs the public about the complaint procedures.*

The recipient local government was required to develop and adopt these plans. Beyond adoption, the level of fair housing activity varied from recipient to recipient. Consortium members who have previously developed Small Cities Fair Housing Plans include:

- 1. Ayden*
- 2. Bethel*
- 3. Farmville*
- 4. Grifton*

A review of several plans showed that increasing the local awareness and education of fair housing requirements was common among all the plans. Publishing fair housing notices, distributing brochures, flyers, and posters were also typical

proposed activities. A complaint procedure was also typical proposed with the Town Clerk usually serving as the Compliance Officer. *(Copies of the Small Cities Fair Housing Plans are included in Appendix 2).*

B. Private Activities/Programs

1. Real Estate Community

According to the Executive Officer of the Association of Realtors, and in part from the survey, the majority of its members are well aware of fair housing requirements. The Association also has a "Fair Housing and Equal Opportunity Committee."

2. Lending Institutions

All of the major mortgage lenders appear to be aware of their obligations under the Community Reinvestment Act (CRA). Most banks/lenders have a "Community Investment" officer, etc., and nearly all have some special CRA loan products or programs. The effectiveness of these programs and/or products are difficult to assess, especially when compared to the HMDA summary analysis in Section II (See Section II).

3. Advocacy Groups

There are several local advocacy groups which, because of their local contacts with citizens, are often aware of fair housing complaints. These are usually referred to the Human Relations Office. Among these advocacy groups are the following:

a. **NAACP**

b. **SCLC (Southern Leadership Conference)**

c. **C.A.R. (Citizens Against Racism)**

d. **Pitt County Mental Health, Developmental Disabilities and Substance Abuse Services**

This branch of the statewide agency by the same name works to facilitate housing for persons with developmental disabilities. Most of the housing has been in the form of group homes. The agency currently does not have any complaints or reports of Fair Housing violations.

e. **Martin County Community Action Agency**

Martin County Community Action Agency (MCCAA), is the regional anti poverty agency which includes Pitt County as part of its service area. The main mission of the MCCAA is to render a variety of supportive services that will ultimately lead to individual self-sufficiency. This nonprofit agency serves approximately 1,500 people per year. Some of its efforts in Pitt County are coordinated through the Bethel Family Resource Center. The Resource Center provides transportation, outreach programs, and community collaboration.

f. **Pitt County Housing Coalition**

The Pitt County Coalition operated as a clearinghouse for low-income families, individuals, and those persons with special needs. The Coalition is a community catalyst and

liaison for providing information on housing services, new programs or other initiatives.

g. South Lee Street Neighborhood Improvement, Inc.

Founded in 1995, this nonprofit community owned and operated development corporation, seeks to eliminate poverty, rehabilitate housing, create jobs, and improve the overall quality of life for the residents of South Lee Street in Ayden.

4. Special Programs and Initiatives

There are also several local initiatives within the Consortium which are supportive of overall fair housing opportunities, especially for low-moderate income persons. Some of these are briefly described below.

a. Affordable Housing: City of Greenville Bond Revenue Program Initiative

In November 1992, before the City became a HUD Entitlement City, the citizens of Greenville approved a \$1 million dollar bond referendum for Affordable Housing Programs. The programs are designed to assist very-low, low, and moderate income, families, persons, and elderly. The programs include:

- *Downpayment Assistance for first-time homebuyers*
- *Elderly Rehabilitation for Elderly homeowners*
- *Carolina Heights Subdivision area specifically designated for affordable single family homes*

- *City of Greenville/Self -Help Credit Union Partnership is a mortgage financing program for first-time homebuyers*

b. Farmville Affordable Homeownership Program

Operated by the Mid-East Commission, the Farmville Affordable Homeownership Program serves income eligible individual and families. The Program's purpose is to increase homeownership among the low-income population through construction of affordable homes, counseling, and down payment assistance. The Farmville Affordable Homeownership Program currently has a list of 130 families who have noted interest in participating in this initiative.

c. Farmville Housing Development Corporation

Farmville Housing Development Corporation supplies newly built single family homes to low/moderate income individuals and families. To date, the Corporation has sold three (3) homes and has two (2) under construction.

Summary

The Consortium's current profile of Fair Housing programs and activities indicate the potential for future collaborative efforts between Consortium members, other public entities, private entities, and advocacy groups. The basic fair housing initiatives previously adopted by Small Cities Block Grant recipients may well remain in place, forming an easy linkage to the new HOME program. All of these actors have the

potential to contribute to the Community's overall efforts to affirmatively further fair housing and effectively address identified impediments.

V. CONCLUSIONS AND RECOMMENDATIONS

A. General Conclusions

Greenville, an Entitlement City since 1994, became part of the newly formed Pitt County Consortium in late 1997. Prior to joining the Consortium, the City prepared its own analysis of Fair Housing Impediments. The main purpose of this analysis of impediments of fair housing choice is to gain insight of the impediments in the Consortium's jurisdiction. Therefore, Ken Weeden & Associates, Inc. have concluded that:

"Yes. The Pitt County Consortium does have some identifiable impediments to Fair Housing Choice, related primarily to income and economic disparities and apparent unequal access to mortgage financing; these factors also coinciding with race and low-moderate income status."

B. Recommendations

Based upon an analysis of impediments to fair housing choice for the Consortium contained in this report and the examination of supporting documents the following recommendations are made:

1. The City of Greenville, and the Lead Entity for the Pitt County Consortium, should provide local financial institutions and/or other local groups with a copy of this Fair Housing Impediments Analysis and seek to build public/private partnerships to address what appears to be unfair lending practices and other identified fair housing problems. The possible linkage with the financial institutions' CRA requirements could help further the fair housing and lending goals of the Consortium and of local lending institutions.

2. It is strongly recommended, based on the anecdotal and statistical evidence presented, that the City of Greenville adopt a substantially equivalent fair housing ordinance and provide funding for local enforcement through the Greenville's Human Relations Office.
3. The City of Greenville and the Pitt County Consortium with the cooperation and assistance of local realtors should undertake an aggressive education and outreach campaign related to fair housing rights and responsibilities.
4. CDBG and HOME funds should continue to be targeted to reduce inequities in the access to goods and services that exists in Census Tracts with minority concentration of 50% or greater. Further, it is recommended that incentives for the location of retail business in these areas be provided.
5. Finally the City of Greenville as the Lead Entity, should incorporate the Consortium's Fair Housing Planning needs into the next step- its Fair Housing Action Plan.

Contents/Outline of Fair Housing Action Plan

- Clear goals and objectives
- Specific time periods for completion
- Identification of individuals and organizations to be involved in plan design and execution
- Prioritized list of activities

The Action Plan will be developed later by the City's CD/HOME staff.

APPENDICES



1. Survey Questionnaire



M E M O R A N D U M

DATE: June 4, 1998

TO: Housing Agencies, Financial Institutions, and
Real Estate Community/Greenville, NC

FROM: Merrill P. Flood, Deputy Director
Department of Planning & Community Development

RE: SURVEY: City of Greenville
Impediments to Fair Housing Analysis

The Department of Planning & Community Development is conducting an analysis of the Impediments to Fair Housing in Greenville. The City has contracted with Ken Weeden & Associates, Inc. (KWA) to assist with this study. The purpose of the analysis is to help the City develop a plan to address identified problems and to promote Fair Housing.

In the early phase of this study, we are contacting various entities in the community, seeking their input in trying to "identify" factors which may constitute impediments to Fair Housing choice in the City. We would also like representative input from you or your agency, by completing the attached questionnaire and returning it to:

City of Greenville
Department of Planning & Community Development
Post Office Box 7207
Greenville, NC 27835-7207

Or, FAX it to us at (252) 830-4483

Along with the survey form is some sample information helping to define what is considered discrimination or "impediments" to Fair Housing choice.

If you have any questions please contact Merrill P. Flood, at:
(252) 830-4500

Thank you.

Please Return by: JUNE 22nd, 1998 To:
City of GREENVILLE, NC
Planning and Community Development Department
PO Box 7207
Greenville, NC 29217
Phone 252-830-4500 FAX 252-830-4483

Impediments to Fair Housing Analysis: Survey

The City of Greenville is conducting an analysis of the "Impediments" to Fair Housing. The purpose is to use the analysis to help the City develop a plan to promote Fair Housing. Your input is much appreciated! (See list on reverse for background info.)

I represent the following: (Please Check One Only).

☐ Real Estate agency ☐ Housing Serv. Prov. ☐ Lender ☐ Insurance ☐ Appraisal ☐ Other

1. Are you/or your agency/organization aware of the "basic" Fair Housing requirements (which prohibits discrimination in buying, selling, renting, or lending, if based on race, color, religion, sex, natural origin, family status, or handicap)? Yes ☐ No ☐.
2. Are you/or your agency/organization aware of any "Fair Housing Complaints," within the past five (5) years? (i.e., in buying, selling, renting, lending, appraisal, or insuring property?)
Yes ☐ No ☐.

If yes, please describe briefly below, or attach additional information.

- a. _____
- b. _____

3. What, in your opinion, or assessment, are the major problem(s) inhibiting Fair Housing "Choice" in Greenville? (Please list, if any).

4. What solutions do you think might resolve the problem(s)? (Attach additional response if needed).

If you are a Lender, please answer questions #5 and #6.

5. Does your institution have "special" Community Reinvestment Act (CRA) projects/activities or initiatives targeted to Greenville? Yes ☐ No ☐. (Please list 2-3 examples, if any. Attached additional info, if desired)

6. Would you or a representative of your organization be willing to participate in a public "Fair Housing Forum", if the City conducted one in the future? Yes ☐ No ☐.

If you are an Appraiser or Insurance Rep., please answer question #7.

7. What criteria or standards do you use in your assessments? (Attach additional response if needed.)

Thank you very much!
(For questions or additional information, please contact the Planning Department, 252-830-4500)

2. Local Fair Housing Plans



AYDEN



PUBLIC NOTICE

1983 FAIR HOUSING ACT INFORMATION

As most citizens are aware, the Town of Ayden has received CDBG funds from the North Carolina Division of Community Assistance for housing and public works improvements in the Southside area. The FY89 project is nearing completion, while the FY91 project will be starting this spring.

One of the conditions in the town's grant agreements with the state is that the town take steps to affirmatively further fair housing. The town has adopted a Fair Housing Policy and posted information about fair housing in the municipal building. During the next year the town plans to undertake additional activities to inform local citizens about rental and homeowner assistance programs available through county, state, and federal agencies.

Title VIII of the Civil Rights Act of 1968 prohibits discriminatory housing practices on the basis of race, color, sex, religion, or national origin. The law governs rental property and sales transactions, and applies to individuals as well as lending institutions.

In 1988, Congress passed the Fair Housing Amendments Act. This law expanded "discriminatory housing practice" to include discrimination against families with young children and the handicapped. Additionally, the new law makes it easier for complaints to be reviewed at the local and state level and strengthens the enforcement process.

North Carolina has adopted a state Fair Housing Act which reflects the federal laws described above, and which also makes it easier for individuals in municipalities like Ayden to file complaints concerning discriminatory housing practices. Brochures outlining the N. C. Fair Housing Act are available at the Ayden Municipal Building.

The Town of Ayden has adopted a local Fair Housing Policy that establishes a procedure for handling complaints concerning housing discrimination at the local level. If you experience discrimination in housing because of race, color, sex, religion, handicap, or national origin, please contact Mr. Rick Benton, the Ayden Town Manager, at the Ayden Municipal Building (746-4152). Complaints will be reviewed and forwarded to the North Carolina Human Relations Council in Raleigh for further review and conciliation.

Complaints concerning discriminatory housing practices can also be forwarded directly to the North Carolina Human Relations Council, 116 W. Jones Street, Raleigh, North Carolina 27611 (by telephone: 919-733-7996).

UPDATE TO PREVIOUSLY APPROVED RECIPIENT'S PLAN TO FURTHER FAIR HOUSING

Town of Ayden

91-C-8116

Ralph Ford, Town Clerk

(919) 746-4152

A. REVIEW OF FAIR HOUSING PLAN approved 1/90

1. Housing Discrimination Complaint Procedure

- a. Procedure is in place for all citizens to use: ☒ Yes ☐ No
- b. Indicate method used to notify public of availability of complaint procedure:

Article published in Ayden News Leader, to inform citizens of the expanded scope of anti-discrimination in the Fair Housing Amendments Act of 1988, Informational packet delivered to local banks and realtors; notice posted in Ayden Municipal Building.

- c. If applicable, describe any changes made to the procedure since Plan approved:

The town did not air public service announcements about the Fair Housing Amendments Act of 1988 and Title VIII of the Civil Rights Act of 1968 on a local radio station as a public service announcement. Dissemination of information to banks and realtors and the posting of notices was considered more effective. There is not a local radio station.

2. Approved Activity(ies) (attach additional pages as necessary)

List completed/on-going activity(ies) Give date(s)
completed/implemented

- 1. Developed informational package on Title VIII and town's Fair Housing Complaint procedure and distributed to area housing-related businesses.
Fall, 1990 and Winter, 1991.
- 2. Published an article in the Ayden News Leader about Fair Housing policies in the Town of Ayden.
January, 1992.
- 3. Applied for and received FY90 NCHFA funds and FY91 CDBG funds to make improvements to LMI single-family housing in Ayden.
October, 1990 and August, 1991.

B. FAIR HOUSING PLAN UPDATE

A grantee with an approved Fair Housing Plan must submit an updated Plan showing an incremental level of activity(ies) to further fair housing if (1) the approved Plan has scheduled activities for only one year instead of the entire active period of the grant; or (2) the current Plan was approved less than one year from a grantee's new award, the current Plan must be updated on the anniversary date of its approval.

List new activity(ies) (attached additional pages as necessary)
Give Time Schedule

1. The Town Manager's office will compile a resource file of available housing assistance programs, including brochures and handouts, from the N.C. Housing Authority. An article will be published in the town newsletter explaining the availability of this information during normal office hours at the Town Manager's office.
June, 1992.
2. The town will prepare a summary listing of available housing assistance programs, including loan assistance, rehabilitation assistance, and rental assistance programs. The listing will include addresses and phone numbers of contact agencies. Copies of this listing will be distributed to area banks and realtors, and will also be kept on hand at the Ayden Municipal Building.
September, 1992.
3. The town will provide every applicant for CDBG assistance a copy of the brochure Fair Housing Its The Law In North Carolina provided by the N.C. Human Relations Council.
Continuing Activity.

Marvin C. Baldree, Jr.
Name of Mayor or Chairman

MC Baldree
Signature of Mayor or Chairman

Mayor
Title

BETHEL



North Carolina
Department of Commerce

James B. Hunt Jr., Governor

E. Norris Tolson, Secretary

June 25, 1997

The Honorable Frank M. Hemingway, Mayor
Town of Bethel
P.O. Box 337
Bethel, North Carolina 27812-0337

Dear Mayor Hemingway:

Subject: Fair Housing Plan
CDBG Number: 96-C-0205

We have reviewed the Fair Housing Plan submitted by the town. Based on our review, we have determined that the plan complies with Title VIII of the Civil Rights Act of 1968 and generally satisfies DCA requirements.

Thank you for your cooperation. No further correspondence is necessary at this time. If you have any questions, please contact Stephanie Morris at (919) 733-2850 (TDD 1-800-735-2962).

Sincerely,

A handwritten signature in black ink, appearing to read "C.E. Thompson".

Charlie E. Thompson, Chief
Grants Management and Compliance Section

CET/SM/gmd

cc: Don Harvey

Division of Community Assistance - William A. McNeil, Director
Suite 250, 1307 Glenwood Avenue, P. O. Box 12600, Raleigh, North Carolina 27605
Telephone 919-733-2850 • FAX 919-733-5262 • TDD 1-800-735-2962

An Equal Opportunity Affirmative Action Employer

**TOWN OF BETHEL
FY 96 COMMUNITY DEVELOPMENT PROGRAM**

FAIR HOUSING PLAN RESOLUTION

A Resolution Authorizing the Adoption of a Fair Housing Plan for the Bethel Community Development Program.

Be It Resolved by the Town Commissioners of Bethel, North Carolina, That:

WHEREAS, the Town is participating in the Community Development Block Grant Program under the Housing and Community Development Act of 1974, as amended, administered by the North Carolina Department Commerce; and

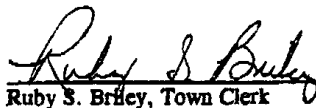
WHEREAS, a Fair Housing Plan is required for this Program;

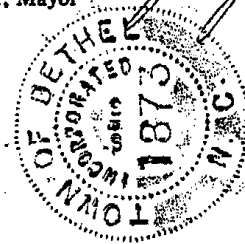
THEREFORE, BE IT RESOLVED, that the Town Commissioners of Bethel, North Carolina, hereby adopts the attached Fair Housing Plan to be used throughout the implementation of the Bethel Community Development Program.

Adopted this 6th day of May, 1997.


Frank M. Hemmingway, Mayor

ATTEST:


Ruby S. Briley, Town Clerk



RECIPIENT'S PLAN TO FURTHER FAIR HOUSING

Town of Bethel
Grantee

P.O. Box 337, Bethel, NC 27812
Grantee's Address

Terri Parker Eakes, Town Administrator
Contact Person

(919) 825-6191
TDD (800) 735-2962
Telephone Number

- I. Indicate if the grantee will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.

First Time X

Past Activities

- II. Identify and analyze obstacles to affirmatively furthering fair housing in grantee's community. (Use additional pages as necessary.)

Discussions with local public officials and the local entitlement Community (City of Greenville) indicate that housing related industries (contractors, lenders, realtors, appraisers) are aware of the need for fair housing; however, they lack information regarding Federal and State fair housing legislation. Public-assisted housing providers appear to be more knowledgeable of legislation. All activities undertaken will have provisions of reaching the visually and hearing impaired and ensure equal opportunity for housing in the community for all persons regardless of income status.

- III. Briefly describe the activities that the grantee will undertake over the active period of the grant to affirmatively further fair housing in their community. A time schedule for implementation of these activities must be included. Activities must be scheduled for implementation at least on a quarterly basis. (Use additional pages as necessary.)**

The Town of Bethel has developed a fair housing program that includes activities that have provisions for reaching the visually impaired and ensuring equal opportunity for housing in the community for all persons regardless of income status. Activities scheduled for the Bethel FY 96 Community Development Program include:

- Send a representative to the Fair Housing Workshop for communities that are located in an entitlement community. (August 1996)
- Prepare a fair housing discrimination complaint procedure. (October 1996)
- Obtain Analysis of Impediments to Fair Housing from the City of Greenville to begin coordination with entitlement city for the fair housing assessment. (January 1997)
- Arrange and conduct a meeting with City of Greenville officials to discuss and coordinate fair housing activities. (April 1997)
- Publish the fair housing discrimination complaint procedure in the newspaper. (July 1997)
- Prepare a poster for distribution and posting that summarizes fair housing requirements under Title VIII of the Civil Rights Act of 1968, as amended. The poster will also inform citizens of the fair housing discrimination complaint procedures. (October 1997)

IV. Will the above activities apply to the total municipality or county?Yes X No (If no, provide explanation.)**V. Describe grantee's method for receiving and resolving housing discrimination complaints. This may be either a procedure currently being implemented or one to be implemented under this CDBG grant. Include a description of how the grantee informs the public about the complaint procedures. (Use additional pages as necessary.)**

1. Any person or persons wishing to file a complaint of housing discrimination in the Town may do so by informing Terri Parker Eakes, Town Administrator, Town of Bethel, P.O. Box 337, 201 West Railroad Street, Bethel, North Carolina 27812, Phone: (919) 825-6191, TDD: (800) 735-2962, of the facts and circumstances of the alleged discriminatory act or practice;
2. Upon receiving a housing discrimination complaint, the Town shall inform the North Carolina Human Relations Commission (Commission) and the complainant about the complaint within ten (10) calendar days of receipt for conciliation and resolution. The Town shall then assist the Commission and the complainant in filing an official written housing discrimination complaint with the Commission, pursuant to the State Fair Housing Act and Title VIII;
3. The Town shall offer its assistance to the Commission in the investigation and conciliation of all housing discrimination complaints which are based upon events occurring in Bethel, North Carolina.
4. The Town shall publicize within Bethel, North Carolina that it is the local agency to contact with housing discrimination complaints.

The Town has developed and will disseminate the above Fair Housing Complaint Procedure. The public will be informed through handouts, educational materials, posters, and newspaper article(s).

APPROVED:

Frank M. Hemingway

Name of Mayor or Chairman


Signature of Mayor or Chairman

Mayor

Title

May 6, 1997

Date

FARMVILLE

FURTHER FAIR HOUSING

Recipient: Town of Farmville
Address: P. O. Box 86, Farmville, NC 27828
Grant number: CDBG No. 95-C-0259
Contact Person: Richard Hicks
Telephone Number: 919-753-5774

A. REVIEW OF FAIR HOUSING PLAN approved July 23, 1996

1. Housing Discrimination Complaint Procedure

- a. Procedure is in place for all citizens to use: ☒ Yes
b. Indicate method used to notify public and availability of complaint procedure: The Town Manager shall publicize within the Town of Farmville that he is the local official to contact with housing discrimination complaints.
c. If applicable, describe any changes made to the procedure since Plan approved: none

2. Approved Activities(ies) (attach additional pages as necessary)

List completed/on-going activities (ies)

Give date(s)
completed/implemented

1. Pamphlets & related information will be distributed to Town residents yearly & made available to the general public. on-going yearly
2. Counseling will be provided to target area residents continuously in the program and group counseling will be available on annual basis. on-going yearly
3. Public announcement education information will be published in Town wide media semi-annually. on-going

B. FAIR HOUSING PLAN UPDATE

A recipient with an approved Fair Housing Plan must submit an updated Plan showing an incremental level of activity(ies) to further fair housing if (1) the approved Plan has scheduled activities for only one year instead of the entire active period of the grant; or (2) the current Plan was approved less than one year from a recipient's new award, the current Plan must be updated on the anniversary date of its approval.

List new activity(ies)

(attach additional pages as necessary)

Give Time Schedule

4. Information will be distributed to area lender, businesses, churches, and key people in the community who are involved in project to make information available to possible participants.

Semi-annually

9/3/96

Date

Robert . Winborn

Name of Mayor

Robert E. Winborn

Signature of Mayor

Mayor of Farmville

Title

FARMVILLE 1993 CDBG
FAIR HOUSING POLICY

Fair Housing law prohibits discrimination in most housing on the basis of race, religion, sex, familial status, handicap or national origin. The Town of Farmville supports this law pursuant to participation in the CDBG program.

It is unlawful in the sale, rental or lease of real property to:

- Refuse to negotiate, receive/transmit a bonafide offer, or engage in a transaction
- Make unavailable or deny housing in any way
- Misrepresent availability or limit inspections
- Advertise or offer the property with an indication or understanding of future discrimination
- Promote panic selling concerning protected class neighborhood composition changes, lowering of property values, criminal/antisocial behavior or quality of schools
- Use an application which indicates intent of discrimination against protected class persons
- Discriminate in membership of real estate transaction related organization

Fair Housing Law does not apply to:

- Rental of accommodations in a building which contains housing for fewer than five families living independently if the person who is leasing the building or a member of his family resides in one of the units
- Rental of a room in a house by an individual if he or a member of his family resides therein
- Religious, charitable or educational institutions or organizations which give preference to members of the same religion, as long as membership in such religion is not restricted by race, color, sex or national origin
- Private clubs which may provide lodging to their members or give preference to their members if they are not open to the public
- Single-sex dormitories with respect to discrimination based on sex
- A person who adopts and carried out a plan to eliminate present effects of past discrimination or to assure equal opportunity in real estate transactions as part of a conciliation agreement under state or federal law

Complaints may be filed with the Town Manager. Any written complaint will be responded to within 10 calendar days. Any unresolved complaints will be forwarded to the N.C. Human Relations Commission. Access to this Policy for the hearing impaired may be obtained through TDD# 1-800-735-2962.

GRIFTON

Recipient's Plan to Further Fair Housing

Town of Grifton

Recipient

P.O. Box 579, Grifton, NC 28530

Recipient's Address

Joe Albright, Town Administrator

Contact Person

TDD 1-800-735-2962
919-524-5168

Telephone Number/TDD Number

- I. Indicate if the Recipient will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.**

First Time

X

Past Activities

- II. Identify and analyze obstacles to affirmatively furthering fair housing in recipient's community. (Use additional pages as necessary.)**

The primary obstacle to furthering fair housing in the town is the lack of knowledge and awareness by town citizens of Title VIII information.

- III. Briefly describe the activities that the recipient will undertake over the active period of the grant to affirmatively further fair housing in their community. A time schedule for implementation of these activities must be included. Activities must be scheduled for implementation at least on a quarterly basis (Use additional pages as necessary.)**

The Town proposes to undertake steps to provide information to Town residents on Title VIII requirements. The proposed steps are distribution of Title VIII information pamphlets, counseling services, and public announcement information.

- | | | |
|-------------------|-------|---|
| 1. First Quarter | 7-96 | Develop a Fair Housing Plan consistent with Title VIII requirements. Submit Fair Housing Plan to DOC for consideration. |
| 2. Second Quarter | 10-96 | Contact the NC Human Relations Commission for Fair Housing pamphlets and information. |

2. Upon receiving a housing discrimination complaint, the Town Administrator shall immediately transmit the complaint to the North Carolina Human Relations Commission about the complaint. The Town Administrator shall then assist the Commission and the complainant in filing an official written housing discrimination complaint with the Commission, pursuant to the State Fair Housing Act and Title VIII.
3. The Town Administrator shall offer assistance to the Commission in investigation and reconciliation of all housing discrimination complaints which are based upon events occurring in Grifton.
4. The Town Administrator shall publicize in the local paper who is the local official to contact with housing discrimination complaints.

Approved:

Ralph L. Thaxton, Mayor


Signature


Title


Date

- | | | |
|--------------------|-------|--|
| 3. Third Quarter | 1-97 | Fair Housing pamphlets will be made available to the public at the Town Hall. |
| 4. Fourth Quarter | 4-97 | Fair Housing pamphlets will be supplied to local Lenders and Realtors. |
| 5. Fifth Quarter | 7-97 | Fair Housing information and complaint procedure will be published in the local newspaper. |
| 6. Sixth Quarter | 10-97 | Fair Housing pamphlets will be checked and restocked in the Town Hall. |
| 7. Seventh Quarter | 1-98 | Fair Housing pamphlets will be supplied to local Lenders and Realtors. |
| 8. Eighth Quarter | 4-98 | The NC Human Relations Commission will be contacted for additional Fair Housing information. |

IV. Will the above activities apply to the total municipality or county?

Yes X No (If no, provide explanation.)

V. Describe grantee's method for receiving and resolving housing discrimination complaints. This may be either a procedure currently being implemented or one to be implemented under this CDBG grant. Include a description of how the grantee informs the public about the complaint procedures. (use additional pages as necessary.)

Grifton has adopted the following procedures for receiving and resolving housing discrimination complaints:

1. Any person or persons wishing to file a complaint of housing discrimination in Grifton may do so by informing the Town Administrator of the facts and circumstances of the alleged discriminatory act or practice.

GREENVILLE

RESOLUTION NO. 1221

A RESOLUTION TO ADOPT A FAIR HOUSING PLAN

WHEREAS, the Congress of the United States enacted Title VIII of the 1968 Civil Rights Act (amended in 1974) establishing federal policy for providing fair housing throughout the United States, and

WHEREAS, the N.C. General Assembly enacted Chapter 41A of the N.C. General Statutes established state policy for providing fair housing, and

WHEREAS, the City of Greenville, as a recipient of federal community development funds under Title I of the Housing and Community Development Act of 1974, is obligated to administer community development programs in compliance with Title VIII and to certify that it will affirmatively further fair housing.

NOW, THEREFORE BE IT RESOLVED:

Section 1. The Fair Housing Plan for the City of Greenville, dated June 14, 1990, is hereby adopted.

Section 2. This resolution shall be effective upon adoption. Adopted this 14th day of June 1990.

Sign: Nancy Jenkins
Nancy Jenkins, Mayor

Attest: Lois Worthington
Lois Worthington, City Clerk

CITY OF GREENVILLE

Fair Housing Plan

City of Greenville Fair Housing Plan - June 14, 1990

Purpose

Title VIII of 1968, as amended in 1974, established federal policy for providing fair housing throughout the United States. The intent of Title VIII is to assure equal housing opportunities for all citizens.

The City of Greenville, as a recipient of federal community development funds under Title I of the Housing and Community Development Act of 1974, is obligated to administer community development programs in compliance with Title VIII and to certify that it will affirmatively further fair housing. The City of Greenville, through the Community Development Division and the Human Relations Council developed a Fair Housing Plan to meet its obligation. This plan outlines the City's goal, objectives, and program activities to affirmatively further fair housing.

Goal

To eliminate discrimination and unfair treatment in the provision of sale or rental housing in the Greenville community.

Program Objectives

Short Range

1. To provide assistance to residents in the resolution of housing complaints.
2. To assess community housing needs for the development of future housing strategies.
3. To provide educational opportunities for increasing citizen awareness of Fair Housing Laws.
4. To develop a Fair Housing Ordinance.

Long Range

5. To promote development of a voluntary affirmative action marketing agreement by the local Board of Realtors and Homebuilders' Association.
6. To evaluate the effectiveness of the local Fair Housing Ordinance and the Fair Housing Plan.

Program Activities

- 1.1 Designate the Community Relations Officer as the responsible person to implement the Fair Housing Plan.
- 1.2 Community Relations Officer develops process and procedures for handling housing complaints.
- 2.1 Human Relations Council and Community Development Division coordinate the implementation of a Community Housing and Needs Assessment.
- 3.1 Community Relations Officer coordinates the implementation of a community-wide Fair Housing Workshop.
- 3.2 Public Information Officer disseminates information about Greenville's fair housing activities.
 - Makes monthly public service announcements through local media (radio, television, and newspapers) advertising fair housing mediation services.
 - Prepares and distributes posters to local merchants advertising fair housing workshops.
 - Mails flyers on fair housing mediation services and fair housing mini-workshops to residents of community development target areas.
- 3.3 Human Relations Councilors make presentations on fair housing at various community organizations.
- 3.4 Community Relations Officer and Community Development Division conduct mini-workshops on fair housing in community development target areas.
- 4.1 Human Relations Council reviews 1973 and 1980 City Council Resolutions urging fair housing.
- 4.2 Human Relations Council identifies specifications for Fair Housing Ordinance.
- 4.3 City Attorney drafts Fair Housing Ordinance.
- 4.4 Human Relations Council contacts Local Board of Realtors and Home Builders' Association to solicit cooperation and support.
- 5.1 Mayor and Human Relations Council contact Local Board of Realtors and Home Builders' Association to solicit cooperation and support.

- 5.2 Community Relations Officer works with realtors and home builders on the development of a voluntary affirmative marketing agreement.
- 6.1 Community Development Division analyzes data from Community Housing and Needs Assessment and presents information to Human Relations Council.
- 6.2 Community Relations Officer maintains detailed records of complaints and their resolution.
- 6.3 Human Relations Council evaluates the impact of the Fair Housing Plan.
- 6.4 Human Relations Council make recommendations to City Council.

Responsible Person:

The Community Relations Officer of the City of Greenville is the person responsible for the administration of the City's Fair Housing Plan. Interested agencies, organizations, and individuals should direct all inquiries to this official.

How To File A Complaint:

Within 180 days of the incident, contact the Human Relations Officer of the City of Greenville.

Telephone: 919/ 830-4490

Mail: Post Office Box 7207
Greenville, NC 27835-7207

In Person: 201 W. Fifth Street
Greenville, NC

The Community Relations Officer will refer to the U.S. Department of Housing and Urban Development or the N.C. Human Relations Council discrimination complaints which can not be resolved through mediation.